

Members' Library Service Request Form

Date of Document	24/03/17
Originator	Alex Fitzgerald, Information Governance - Team Manager
Originator's Ref (if any)	
Document Title	Records Management Plan Annual Review 2016

Please indicate if access to the document is to be “unrestricted” or “restricted”, with regard to the terms of the Local Government (Access to Information) Act 1985.

Unrestricted	<input checked="" type="checkbox"/>	Restricted	<input type="checkbox"/>
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For Publication

Additional information:

20 Appendices

Authorised By	Jim Lamond
Designation	Head of Council Resources
Date	24/03/17

For Office Use Only:	
Library Reference	49/17
Date Received	30/03/17
Bulletin	Mar17

REPORT TO: Members' Library Service

MEETING DATE:

BY: Head of Council Resources

SUBJECT: Records Management Plan Annual Review 2016

1 PURPOSE

- 1.1 To provide the Council with an update on the progress of the Annual Review of the Records Management Plan agreed with the Keeper of the Records of Scotland under the Public Records (Scotland) Act 2011.

2 RECOMMENDATIONS

- 2.1 To note the contents of this report and the associated review document.

3 BACKGROUND

- 3.1 The Council and the Licensing Board received agreement to their Records Management Plan in December 2014. This included the commitment to undertake an annual review and report on this.
- 3.2 The Keeper of the Records of Scotland agreed several elements as being under 'improvement' and has subsequently launched a scheme, which we piloted, to allow the easier reporting of progress on these elements back to the National Records of Scotland.
- 3.3 Following a successful review of the 2015 progress against the Records Management Plan we are continuing the pattern and have undertaken an assessment of the further progress we have made across the course of 2016. This was undertaken against both our original plan and the recommendations from the Review Team at the National Records of Scotland.
- 3.4 The progress in 2016 was made against the backdrop of the conflicting demands on resources imposed by our preparations for the Scottish Child Abuse Inquiry and other projects, this will continue to be a factor in the continued implementation of our Records Management Plan and the CMT are asked to note this for future reference. There is the possibility that demands on these resources will increase in future.

4 POLICY IMPLICATIONS

- 4.1 There are no direct policy implications of this. It is an active and ongoing piece of work to implement the Records Management Plan as agreed with the Keeper in December 2014.

5 INTEGRATED IMPACT ASSESSMENT

- 5.1 The subject of this report does not affect the wellbeing of the community or have a significant impact on equality, the environment or economy

6 RESOURCE IMPLICATIONS

- 6.1 Financial - None
6.2 Personnel - None
6.3 Other - None

7 BACKGROUND PAPERS

- 7.1 201703_RMP Review Report Summary
7.2 Appendices 1-20.

AUTHOR'S NAME	Alex Fitzgerald
DESIGNATION	Information Governance – Team Manager
CONTACT INFO	x8223
DATE	24 March 2017

Element	Current Status	Progress Status	Improvement plan notes from previous report	Update on provision since 5th January 2016
1. Senior Officer Compulsory element	G		The Keeper agrees that this element requires no further action.	No Change
2. Records Manager Compulsory element	G		The Keeper agrees that this element requires no further action.	No Change
3. Policy Compulsory element	G		The Keeper agrees that this element requires no further action.	No Change
4. Business Classification	A		As requested, the Keeper received a copy of the completed Records Management Survey. The Keeper agrees that the survey and accompanying results and analysis provide a useful insight into records management practice within East Lothian Council. Whilst the survey did not receive a 100 per cent response rate it provides a valuable benchmark from which to assess future developments. It clearly identifies areas where improvements can be made to enable the Council to continue to take steps towards achieving full compliance under this element. The Keeper should be kept informed of any further additions to the assessment.	No Change
			The Keeper agrees that making file naming convention guidance available to staff should eliminate some of the risks of non-standard naming conventions. The Keeper wishes to see evidence of this guidance, how it is disseminated to staff, and how the conventions are to be regulated.	Evidence of guidance and dissemination: Copy of guidance (A1), screen capture from intranet (A2) and Council newsletter 'eNews' from April 2016 (A3). There is currently no assessment of uptake, but is being promoted as best practice.
			The Keeper should be kept informed of the progress of the EDRMS Review. Providing evidence of the findings of the initial survey investigation of all 'software systems' used within the Council would demonstrate the progress being made.	Preliminary outline of different systems completed. Summary of all systems obtained and analysis commenced on types of data held, to determine requirements. More indepth assessment being undertaken by EDRMS project manager.
			Following the outcome of the review the Keeper would be interested to learn the Council's plans for the management of the informational content of these software systems.	
			As restructuring of physical filing is still being considered. The Keeper should be informed of any further developments in this area.	It is still a matter under consideration. With the movement towards reducing paper this may become unnecessary.
			The Keeper has assessed the improvement report and considers that the Council continues to make a strong commitment to restructuring its hybrid document management systems around its published business classification. The Keeper requests that he is kept informed as the project progresses.	Pilot implementation within Licensing progressed, and nearing final completion - structure developed (A4) - awaiting file relocation stage. After completed additional stages will be considered for the roll out of this pattern to other teams.
			The Keeper is content with progress being made and continues to agree this element of the Council's plan under improvement.	

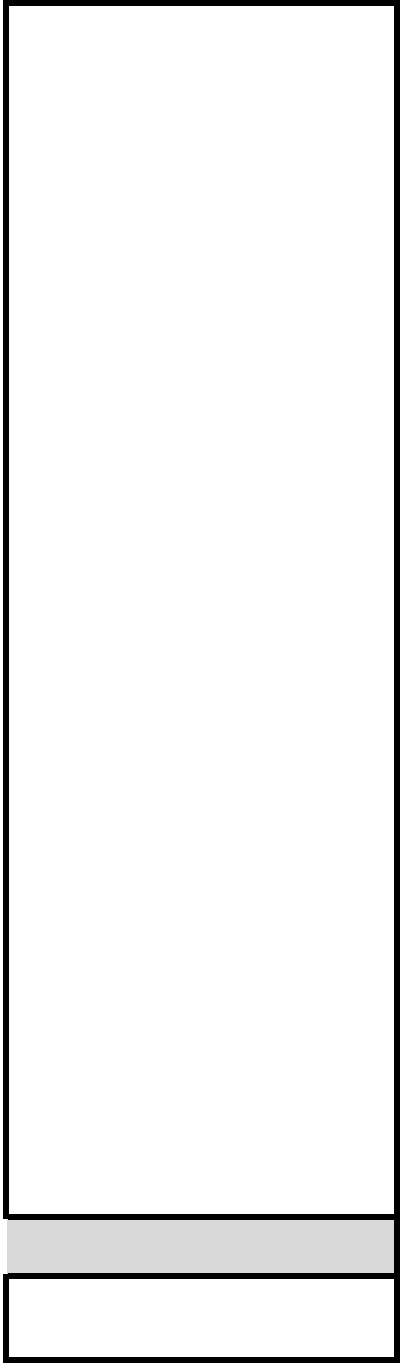
<p>5. Retention schedule</p>	<p>A</p>	<p>The Records Management Survey reports that a large number of respondents felt confident when applying retention rules and compliance in this area is generally good.</p> <p>The Keeper commends the ‘spring cleaning’ currently being undertaken by various departments within the Council.</p> <p>However, as stated in the update assessment by the Council, reports of progress in this area are anecdotal.</p> <p>The Keeper seeks further evidence on the types of activities undertaken and whether these were to a standard applied across all departments.</p>	<p>The retention schedule is readily accessible to all members of staff and has been accessed 33 times during the last quarter of 2016. The stats for the previous period are unavailable due to a change with our intranet. The spring cleaning can be evidenced a little by the destruction activity and is still undertaken consistently within the Council's Records Store. A5 ???</p>
<p>6. Destruction Arrangements Compulsory Element</p>	<p>A</p>	<p>The Keeper has considered the authority's improvement report and notes that further evidence is required to demonstrate that the Council continues to take steps towards achieving full compliance for this element. The Keeper will look forward to learning about the authority's 'destruction recording implementation' process and wishes to be kept updated on developments made in this area.</p> <p>The Keeper is content with progress being made and continues to agree this element of the Council’s plan under improvement.</p> <p>The Keeper has considered the authority's improvement report and commends the dissemination of draft protocols for the use of internal shredders.</p> <p>However, as this evidence is anecdotal the Keeper requires firm evidence of their delivery and implementation, to better demonstrate the Council's efforts to move closer to compliance under this element.</p> <p>The Keeper should be updated on progress made in closing the gaps in provisions in Electronic Records Destruction.</p> <p>The Keeper is content with progress being made and continues to agree this element of the Council’s plan under improvement.</p>	<p>The Council implemented a new Destruction Register in November 2016 which begins to capture this activity. You will find a screen capture of our Reporting form, redacted extracts from the register itself (A6) and also some of the guidance which has been issued to users. (A7 & A8).</p> <p>See above the guidance on selecting waste and recording destructions. (A7 & A8).</p> <p>We have included the functionality in the Destruction Register to record the deletion of electronic records. (A6). This was a specific user request so we can report that the individuals taking responsibility for this area are actively engaging with the process and helping to improve it.</p>

<p>7. Archiving and Transfer</p> <p><i>Compulsory element</i></p>	<p>G</p>	<p>The Keeper commends the development of the Council's Archive Acquisition Policy and requests that the policy be forwarded to him when appropriate. The Draft Archive Acquisition Policy document sent with the initial submission satisfies the Keeper that this element is being actively addressed. The Keeper asks that an extract copy of the Council Cabinet minute of April 2016 be provided to confirm the positive steps taken.</p> <p>The Keeper should be informed of progress of the planned document on Transfer Procedures. Provision of extract minutes of Council Cabinet meetings in which the Transfer Procedures were discussed would suffice, until such time as a finalised copy of the Procedures document can be sent to the Keeper.</p> <p>The Keeper has considered the authority's improvement report and continues to agree this element.</p>	<p>Details of the Cabinet minute at which the Archive Acquisition Policy was approved can be accessed here: http://www.eastlothian.gov.uk/meetings/meeting/5703/cabinet (A9)</p> <p>The Transfer Procedures are still in development at this time.</p>
<p>8. Information Security</p> <p><i>Compulsory element</i></p>	<p>G</p>	<p>The Records Management Survey notes that a proportion of those surveyed felt there was a need for improvements in their security arrangements and this would be explored with the relevant teams in conjunction with Information Security Specialists. The Keeper should be kept updated regarding any changes or developments in this area.</p> <p>The Keeper has considered the authority's improvement report and continues to agree this element.</p>	<p>There is no update at this point.</p>
<p>9. Data Protection & 14. Shared Information</p>	<p>G</p>	<p>The Records Management Survey notes that the Council has tightened controls on sharing information in line with Data Protection procedures, and that specialist training was delivered to all local authority schools. This was an area where the Council had identified a need to improve. The Keeper commends the authority for this initiative. The authority should provide evidence of the dissemination and implementation of this training.</p> <p>As requested, the Council provided the Keeper with East Lothian Licensing Board's Registration number with the Information Commissioner's Office, fulfilling the Keeper's initial request. This was confirmed by checking against the registration listed on the Information Commissioner's website. The Keeper should be informed when the registration is either updated or renewed. The Keeper notes that East Lothian Council's registration with the Information Commissioner is due to expire on 19th September 2016. The Keeper wishes to be informed when this is renewed.</p> <p>The Keeper has considered the authority's improvement report and continues to agree this element.</p>	<p>Please find attached the slides which were used to deliver sessions to all but one of East Lothian's Schools - the outstanding school is still to be given this training. (A10).</p> <p>Here you will find the up to date ICO Register Entries for: East Lothian Council: https://ico.org.uk/ESDWebPages/Entry/Z5759571 East Lothian Licensing Board: https://ico.org.uk/ESDWebPages/Entry/ZA112276 And the ELC Returning Officer: https://ico.org.uk/ESDWebPages/Entry/ZA237447 (A11, A12, A13).</p>

<p>10. Business Continuity and Vital Records</p>	<p style="text-align: center; font-weight: bold;">A</p>	<p>The Records Management Survey notes that additional guidance was created to advise people on how to identify vital records, and this has been included in the Business Continuity training. The Records Management Survey also notes that a Business Continuity AGM was introduced, as well as review reminders to ensure Business Continuity plans are updated where necessary.</p> <p>The Keeper commends these efforts as they indicate continuing progress and development of the Council's business continuity strategy. The Keeper wishes to see evidence of the AGMs implementation.</p> <p>The Keeper also requires that the Council provide him with a redacted sample of a Service Business Continuity Plan as originally requested in the Keeper's report of 5th January 2015.</p> <p>The Keeper is content with progress being made and continues to agree this element of the Council's plan under improvement.</p>	<p>The AGM resulted in the improvement and adoption of a more integrated Business Continuity system. The attached guidance plan is dated 2017 (A14a), but had its basis in the work undertaken in 2016. There is also a screen capture showing the level of integration that 'vital records' now have in the business continuity process (A14(b)). This establishes the policy position and shows the result of the co-ordinated work to improve our support of this function.</p> <p>Please find attached the redacted Business Continuity Plan from 2016 for Licensing, Administration & Democratic Services. (A15). The new system has specific elements on Vital Records so this will be expanded further in future.</p>
<p>11. Audit trail</p>	<p style="text-align: center; font-weight: bold;">A</p>	<p>The Keeper wishes to be kept informed of progress with the Council's EDRMS Audit Survey.</p> <p>The Keeper seeks updates on the progress of the destruction protocols.</p> <p>The Keeper is content with progress being made and continues to agree this element of the Council's plan under improvement.</p>	<p>See Section 4 - general progress on EDRMS functionality is being made. New appointment of an EDRMS Project Manager will undertake a more co-ordinated look at these systems and the way in which this functionality is delivered across the Council</p>
<p>12. Competency Framework for records management staff</p>	<p style="text-align: center; font-weight: bold;">G</p>	<p>The Keeper commends the Council Management Team's approach to formally make Records Management training compulsory earlier in the year.</p> <p>This supports previous evidence supplied in the authority's original submission and it is a strong indicator of the Council's commitment towards continuous improvement. The Keeper wishes to see evidence from the appropriate body which agreed the decision and evidence of the training provided. The Keeper requests that he is kept informed about any further changes made in this area.</p> <p>The Keeper has considered the authority's improvement report and continues to agree this element.</p>	<p>Please find attached the extract from the Council Management Team meeting from 21 January 2016 which approved the training (A16) and copies of the 'offline' version with scoring matrix, and guidance provided to trainers. (A17, A18, A19).</p>

13. Assessment and Review	G		<p>Confirmation that the Data Protection Health Check is underway shows that the action points laid out in the initial submission are being addressed. The Keeper wishes to see the results of the Health Check when completed.</p> <p>The Keeper has considered the improvement report and commends East Lothian Council's Records Management Survey as it reflects good records management practice. The survey demonstrates the active operation of the self-assessment procedure as used by the Council to direct and inform its programme of improvements within the Records Management Plan. It provides a detailed insight into levels of staff confidence and awareness of records issues, as well as providing data on the physical storage of records. The survey also highlights areas where developments within the Council's records management practices are still needed. It is seen as providing a solid base from which to carry out future surveys and assess growing user confidence and measure culture change.</p> <p>In areas where it has been noted that progress is being made, that evidence is mostly anecdotal. The Keeper must be provided with stronger evidence to support these statements of Improvement and how they were measured. By supplying that evidence the Keeper can then be satisfied that the Council is continuing to make improvements under its Records Management Plan.</p> <p>The Keeper has considered the authority's improvement report and continues to agree this element.</p>	<p>Please find attached a list of some of the activities of the Information Governance Compliance Officer relating to the 'Data Protection Health Check'. (A20).</p> <p>It is hoped that the above items of evidence, and the continued participation of East Lothian in the self assessment process, are sufficient to satisfy the Keeper that improvements are still being made to records keeping practices in line with our Records Management Plan obligations.</p>
14. Shared Information		See 9. Data Protection		
15. Freedom of Information	G	G		

Reviewer Comments



File Naming Rules – How to make stuff easier to find in the long run.

You may think this is pedantic – telling you how to name files. But without consistency and some guidelines there is a chance things could get lost, or will not work for our need to manage our information effectively.

A lot of you will be logical and sensible in your file naming but as we want to make this work across the entire Council there needs to be some guidance for you on how to make this happen. The cartoon¹ to the right is the ‘worst case scenario’.

Here are some simple principles and suggested ways to structure your file names which will make it easier, and may reduce your need to have extra folders – as the file name will make everything clear instead.

Basic Rules:

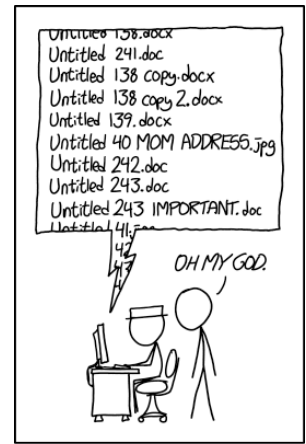
- Make it relevant
- Keep it simple and short
- If necessary put the date in
- If necessary put a version number

Each file will have key elements to be displayed

- Function (e.g.: Minute; Agenda; Report; Email; etc)
- Context (e.g.: FOI Working Group; LADS Management Meeting; etc)
- Date (if relevant – all dates should be formatted: “20150529” and be the first part of name.

The name needs to be short – the maximum character length that Windows can cope with is 256 characters – this is everything from [\\squirrel](#) – through to .docx.

Keep the file name bit to approximately 30 characters. Every character counts!



PRO TIP: NEVER LOOK IN SOMEONE ELSE'S DOCUMENTS FOLDER.

Date Related Items Examples	Version & Date Important Items	Version Only Important Example
20150228_Agenda_ALHRM.doc 20120315_AFE-mailSB_Invoice.msg 20141214_JGCIncidentReport.doc	2015_CultureStrategyV02.doc	DisciplinaryPolicyV07.pdf
Person/Case Reference Examples	General Rules	
SmithJohn_EmpRef1.pdf 20150623_SmithJohn_CoC.pdf 88904256_ClientName_report.doc	<ul style="list-style-type: none"> - Only use _ sparingly to make it easier to read. Maximum twice. - Abbreviate and use acronyms when possible & agree what they are going to be. 	<ul style="list-style-type: none"> - Put the elements in the most logical sequence and be consistent for that type. - Avoid having near identical information together if possible.

Version Control: Sometimes it is very important to know which version of a document is being used. If that is the case you should:

- Add Version # to the file name
- Include the versioning information in the footer of the document.
- Include a version table in the document (if there is space)

It will not always be possible to ensure that everything remains in context so ensure that the file name is clear, but short.

¹ <https://xkcd.com/1459/>

http://intranet.eastlothian.gov.uk/info/20719/information_governance/146/records_managr

Organising your Records | ...

File Edit View Favorites Tools Help

Objective Connect Letter VS Trend 963 Talis SCRAN RIVO Piwik OHIO Newsletter lothliv LearnPro JGC IRBS IMI HR21 Google FOI ELC Dec

Individual working files with copies, drafts and notes should also be routinely destroyed, unless they contain important extra information that is not on the master file.

Managing Paper and Electronic Records

Records may be kept as paper files, or electronically in shared drives, databases, or document management systems. It is important that an "information gap" does not arise during the changeover from paper to electronic filing systems. If there is a paper file on a subject, remember to print out relevant electronic documents and add them to the master file. If these documents are particularly bulky it would be acceptable in an individual's working files to cross-reference to an accessible electronic version. However, particular care should be taken to ensure that the document is available until the paper file is destroyed.

Managing Electronic Files and Folders

If you create a folder or document on a shared drive or on your personal drive, you should take responsibility for managing that folder or document. They should have file titles which are easily understood by all members of staff. Do not name them after yourself, as no-one else will know what they contain. Likewise, only use commonly understood abbreviations. The title should clearly indicate the version status, such as draft 1, final version etc. Here is a [Guide on how to name files correctly](#).

Shared drives should be used for information to which your colleagues may need access. Do not password protect material unless your colleagues know the password so that the information can be accessed in your absence. Use your personal drive only for any information which is genuinely confidential or personal.

Managing Emails

E-mails are as much an official communication as a letter, memo or fax. Your emails may be disclosed in response to a freedom of information or data protection request. Electronic messages can be legally binding, contracts can be set up via e-mail and we may be held liable for defamatory statements in e-mails. For these reasons, do not say things in e-mails that you would not say in other forms of written communication.

Emails should be regarded in exactly the same way as other types of written communication. If they contain important information they should be printed out if there is a paper file, or saved to the electronic folder if the information is held electronically. Most emails are about ephemeral matters. Delete ephemeral or out-of-date emails as soon as they are no longer required: do not allow a backlog to accumulate as this becomes difficult to manage.

16:37
17/03/2017

From: [eNews](#)
Subject: eNews 7.4.16
Date: 07 April 2016 15:56:12
Attachments: [image001.jpg](#)
[image002.gif](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)
[image008.cif](#)
[image003.png](#)
[image016.png](#)
[image003.jpg](#)
[image016.jpg](#)
[image017.png](#)
[oledata.mso](#)
[image007.jpg](#)

cid:image001.jpg@01CDOC08.8E7C12A0



7 April 2016

- [Council News](#)
 - [Jobs](#)
 - [Environment Issues](#)
 - [Health Options](#)
 - [Events](#)
-

Council News

IT Maintenance Notice

There will be disruptions to all IT systems except telephones on Sunday 10th April, to allow essential maintenance to be performed. This will take place between 8am and 5pm. We apologise for any inconvenience.

To all Purchase Card users

You should now have received your purchase card statement for the month to 5th April 2016.

Because of the financial year-end timetable we have to reduce the time you normally have to review these transactions.

Please ensure that you have reviewed all of your transactions in the CardPlus system by Thursday 14th April 2016.

If you have any queries, please email : purchasecards@eastlothian.gov.uk

Records Management Training

The Council Management Team have confirmed that Records Management Training is now compulsory for all staff. This can either be accessed via LearnPro <http://eastlothiancouncil.learnprouk.com/>, new users will need to register and you will find it in the 'Essentials' section or it can be delivered in a simplified paper format by the line managers who deem the online version is more in depth than their staff require. Email afitzgerald@eastlothian.gov.uk to discuss which method is better for your team.



File Naming

As part of our improvements under the Public Records (Scotland) Act there is now guidance available on Nimbus for the new method for naming files. This can be access here: [File Naming Convention](#)

These changes are due to be rolled out to all departments as part of the Business Classification Scheme but there is nothing preventing departments from adopting this new method earlier. If you have any questions please contact records@eastlothian.gov.uk

Is money a constant worry for you?

The East Lothian Poverty Commissioners are a group of people who care about the issue of poverty in East Lothian. We want to find out more about people's experiences of poverty and how it has affected them. Our job is to find ways of tackling poverty. Full details [on website](#)

Environment Issues

Volunteers wanted for Big Nature Festival

RSPB are looking for enthusiastic volunteers who would be interested in helping out at Scotland's Big Nature Festival on the weekend of the 21st and 22nd May 2016 at Levenhall Links in Musselburgh.

We have a whole host of roles that volunteers can get involved in from Parking Attendants to Community Fundraising volunteers. The whole event is a real team effort and we wouldn't be able to do it without our dedicated volunteers – make new friends and learn some great new skills as well as contributing your time to a great cause.

The event was highly successful in 2015 with 107 exhibitors and 6,142 attendees. Once again the festival is being held at the beautiful Levenhall Links in Musselburgh. The site is a haven for wildlife, as well as a premier spot for bird watching. Large areas that were originally used as a dumping ground for ash from Cockenzie Power Station have been transformed into an SSSI wetland nature reserve, managed by East Lothian Council.

The shallow pools and coastal mudflats are home to wading birds like bar-tailed godwit, dunlin, redshank and lapwing, while wigeon graze on the grassy banks and the meadow attracts butterflies and brown hares as well as countless other small critters.

The event will host loads of exciting things to see and do from family fun activities to workshops and talks on conservation and our natural environment. You can find a full list of opportunities on our Big Nature Festival website: www.bignaturefestival.org.uk

Events

New season now on sale at The Brunton:

- The Brunton's new season is on sale now! Find out what's coming up by downloading the [new brochure](#)

Coming up:

Nicholas Mulroy, tenor and Alisdair Hogarth, piano

Sat 9 Apr 3pm | High Tea & Concert £19.95, Concert only £7 in advance, £8 on the day

Schubert's *Winterreise*, perhaps the greatest song cycle of all.

Joy (12A)

Wed 13 Apr 7.30pm | £7.50 (£6.50)

Jennifer Lawrence gives another dazzling performance, this time as Joy Manego, a matriarch who became a self made millionaire.

Elio Pace and his band: The Billy Joel Songbook

Thu 14 Apr 7.30pm | £22.50 (£20)

Celebrating the music of Billy Joel, including the hits *Uptown Girl*, *My Life* and more.

Puppet Animation Festival

The PAF continues to entertain children across East Lothian during the Easter break. This week:

Round String Theatre: Faerie Stories

Fri 8 Apr 11am | Longniddry Community Centre| £5 adult, £4 children
An enchanting production merging puppetry, storytelling and music. For ages 6+.

Make and Take a Funky Puppet


Sat 9 Apr 1.30pm | John Gray Centre, Haddington | £4
Let your imagination run wild in this awesome puppet making workshop.

Book now! 0131 665 2240 / www.thebrunton.co.uk

Keep in touch: Twitter: @TheBrunton | Facebook: TheBruntonMusselburgh


Jobs

Children Inc

 Social Enterprise East Lothian (SEEL) has a vacancy for a Project Coordinator for 'Children Inc' an exciting new project 'Children Inc', that aims to change the way children who require additional support are included and supported in their community. Full details available [on website](#)

Health Options

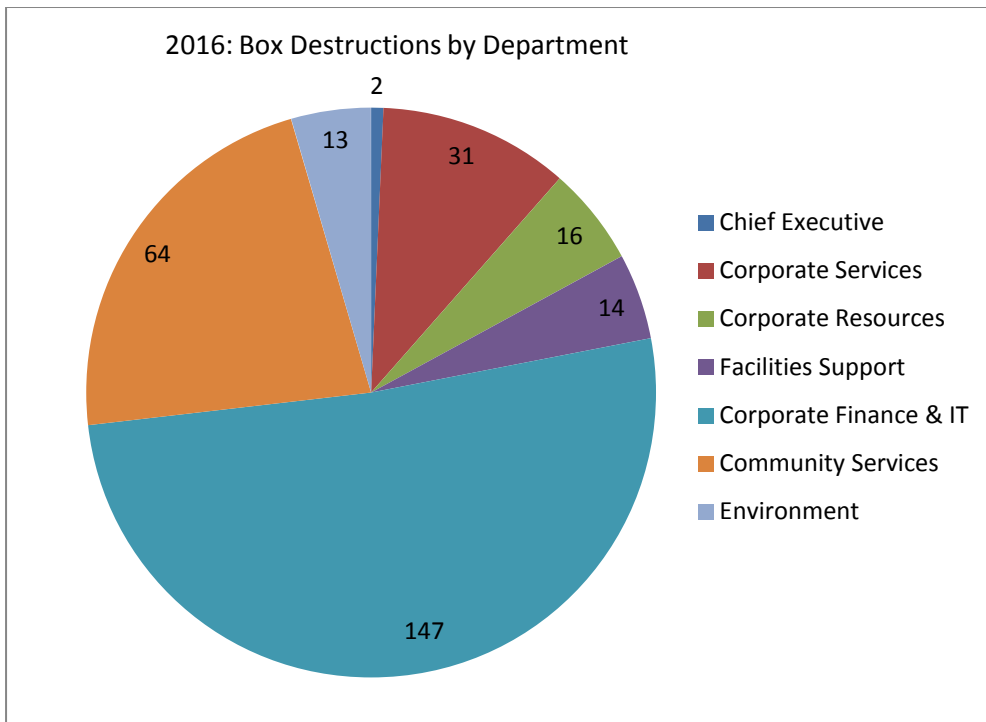
Podiatry appointments

 Lesley has two cancellations on 13th April, so if anyone has issues with their feet, Lesley can help, please email hwl@eastlothian.gov.uk

Wed 13 April	
11.00	Vacant
14.30	Vacant

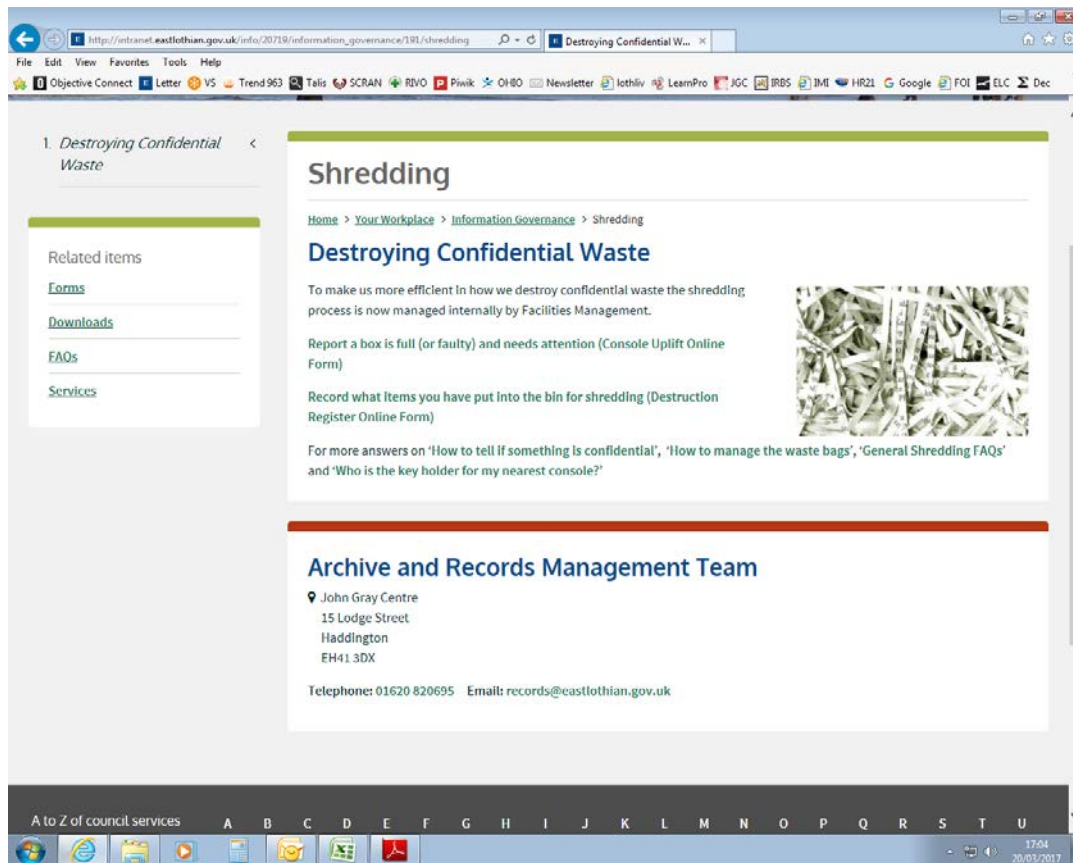


Here is the summary graph of the recorded / authorised destructions from East Lothian Council's Records Store.

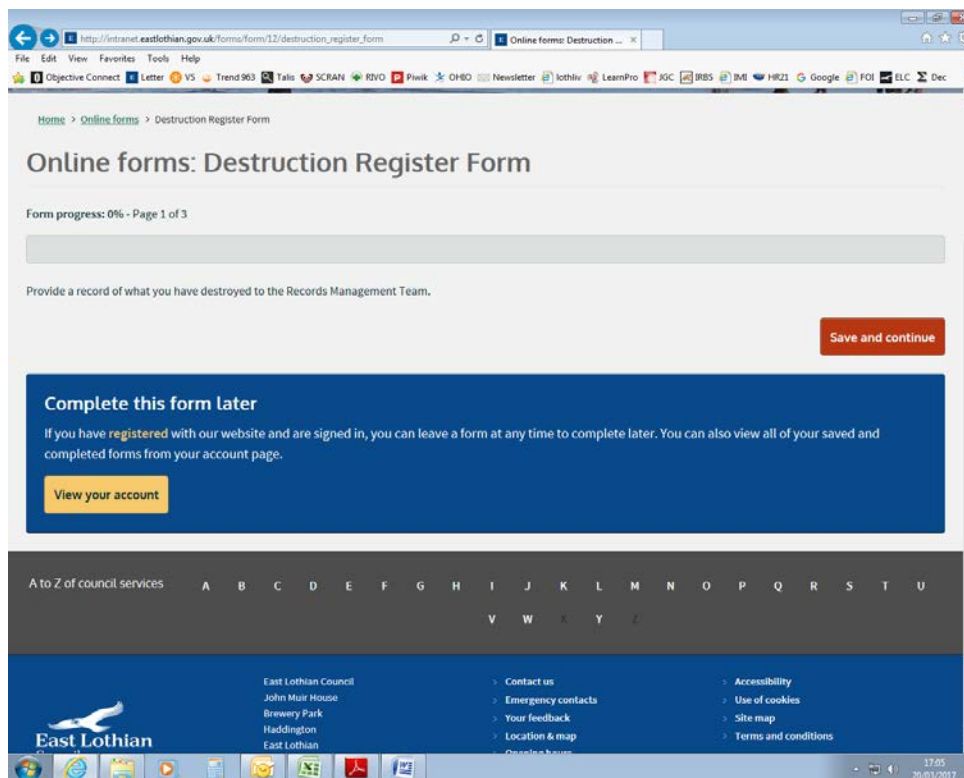


Destruction Process Evidence – East Lothian Council

Landing Page from Intranet:



First Page of 'Destruction Register' webform



Destruction Process Evidence – East Lothian Council

Redacted Extract from EL Destruction Register 2016-17 – User notifications

Destruction Register - ELC				USER DETAILS				USER INPUTS						
Web Ref #	Form	Complete	Status	Site user email	Name	Date	Email	File Number	File Description	Retention Schedu Check	Date Destroyed	Authorised by	Destruction Method	Shredding Code
1338	Destruction Register Form	10/02/2017 11:40	Pending	[REDACTED]	[REDACTED]	10/02/2017	[REDACTED]	[REDACTED]	Working copies of files week ending 10 February 2017	N/A	10/02/2017	[REDACTED]	Confidential Shredding Console	24 - 25 (By central notice board)
1340	Destruction Register Form	10/02/2017 12:03	Pending	[REDACTED]	[REDACTED]	10/02/2017	[REDACTED]	[REDACTED]	Enforcement enquiries regarding planning issues.	N/A	10/02/2017	[REDACTED]	Confidential Shredding Console	11 - Copy Room (By Stair B)
1343	Destruction Register Form	10/02/2017 14:33	Pending	[REDACTED]	[REDACTED]	10/02/2017	[REDACTED]	19	SGA Entries and Results	Yes	10/02/2017	[REDACTED]	Confidential Shredding Console	42 - 9-11 Lodge Street, Photocopier Room
1345	Destruction Register Form	10/02/2017 15:03	Pending	[REDACTED]	[REDACTED]	10/02/2017	[REDACTED]	8	SGA Entries and Results	N/A	10/02/2017	[REDACTED]	Confidential Shredding Console	42 - 9-11 Lodge Street, Photocopier Room
1348	Destruction Register Form	10/02/2017 15:15	Pending	[REDACTED]	[REDACTED]	10/02/2017	[REDACTED]	n/a	staff e-mails relating to Education Conference being held in 2017 Professional Update paperwork from Principal Officer telephone message from Parent Council rep	Yes	10/02/2017	[REDACTED]	Confidential Shredding Console	24 - 25 (By central notice board)

Redacted Extract from EL Destruction Register 2016-17 – Uplift and Destruction Section.

DESTRUCTION TRANSFER REGISTER			USER INPUTS					PRINT UNIT INPUTS				
Web Form #	Source	Completed	Name	Date	Location	Request Type	Notes	Tag	Date Received	Not Tampered	Date Destroyed	Notes
1230	Console Uplift Form	02/02/2017 13:49	[REDACTED]		28	Uplift Full	A0854502		03/02/2017	✓	16/02/2017	
1233	Console Uplift Form	02/02/2017 15:44	[REDACTED]		19	Uplift Full	A0854118		17/02/2017	✓	17/02/2017	
1239	Console Uplift Form	02/02/2017 15:44	[REDACTED]		19	Uplift Full	A0854120		03/02/2017	✓	17/02/2017	
1246	Console Uplift Form	03/02/2017 07:28	[REDACTED]		9	Uplift Full	A0854261		31/01/2017	✓	17/02/2017	

Extract from Destruction Recording Form:

Showing inclusion of 'Electronic Deletion' as an option.

Question 17:

Console ID / Shredding Location - Other Sites

Please select an option

- 00 - Electronic Deletion
- 1 - George Johnston Centre Office
- 2 - George Johnston Centre Office
- 28 - Block A, Brewery Park, Occupational Health Office
- 42 - 9-11 Lodge Street, Photocopier Room
- 45 - Meadowmill, UBS Office
- 47 - Block A, Brewery Park, Internal Audit Office
- 50 - Aldhammer House, Housing Office

How do I know if what I am holding is confidential / sensitive data?

This can be either 'personal' data or can relate to other types of sensitive information.

Does it:

- Contain an individual's contact details (other than their work ones)?
 - Home number, address, email, etc
- Contain sufficient information about an individual that it is possible to identify them from that information?
 - If it is related to a person's job it is unlikely to be confidential, attendance at meetings, etc.
- Contain information of a sensitive commercial nature?
 - This does not include information put in publicly accessible budgets.
 - It does include invoices showing details of purchases / payments.
- Contain information of a sensitive political nature?
- Contain details of council assets or security arrangements?

If you answered 'Yes' to any of the above it is probably confidential & should be destroyed securely.

Please note that if the record provides information on any of the following for clearly identifiable individuals then it is "sensitive" personal data and should always be confidentially destroyed:

- a) their racial or ethnic origin
- b) their political opinions,
- c) their religious beliefs or other beliefs of a similar nature,
- d) whether they are a member of a trade union
- e) their physical or mental health or condition,
- f) their sexual life,
- g) the commission or alleged commission by them of any offence, or
- h) any proceedings for any offence committed or alleged to have been committed by them, the disposal of such proceedings or the sentence of any court in such proceedings.

If you have any doubts or questions please feel free to ask the Information Governance Team.

They can be contacted on either:

foi@eastlothian.gov.uk or records@eastlothian.gov.uk

What has happened?

East Lothian Council has officially ceased to use Shred-It for the provision of our confidential waste destruction and moved to an in-house process operated by Facilities Management.

Why have we changed the arrangements?

There was an in-depth analysis about the comparative costs that we were paying for the service and what would be the cost if we were to bring it in-house. It is cheaper for shredding to be done in-house. This is also to provide greater co-ordination as there were a range of different contracts and renewal dates in place with Shred-It which it was better if the Council reduced down to one method.

So why are we replacing the boxes?

The boxes, or consoles, were the property of Shred-It and so we had to get our own versions to be able to provide you with a familiar style of interaction. This is all being handled by Shred-It and Doree Bonner.

So when will the boxes get emptied?

Unlike the situation with Shred-It, who would come at a set day each month, we have changed to a more responsive model. This means that the console / box will only be emptied if you ask for it to happen.

What do I do if the console is getting full?

If you notice that the box is getting full you should contact the local key-holder ([list available here](#)). Please do not wait until it is overflowing as that will make it difficult both for you to seal the bag and for the Facilities Management staff to lift it.

The difference between the new process and the old is that the bag will need to be taken out of the console and sealed ahead of the uplift.

A supply of number zip tie tags will be located in the bottom of the console.

How do I ask for an uplift?

Once the bag is sealed and ready for uplift you make the requests on the intranet:

<http://intranet.eastlothian.gov.uk/shredding>

The web form will ask for some key details – this will include your name, the location of the Shredding console and also the number of the zip tie tag – this last bit is an important security feature.

How is this still a secure process, Shred-It did it all in one location?

While it is clear that Shred-It did do everything on site, this process is still secure.

For the following reasons: The whole process only involves Council Staff; the bags are sealed with tamper-proof numbered zip-ties; the bags used are designed for the transit of these materials; the process involves checking off the numbered tag so any tampering is detectable once the bag is sealed; the in-house Shredder is of a high standard.

But won't leaving the bag outside of the console be a risk?

Yes, there is a slight risk, but we have ways in which we are controlling that risk:

- there should not be a long time between the uplift request and the actual uplift
- the consoles are all located in Council staff only areas
- the bags are sealed and tagged with a unique number which is checked at all stages

If someone steals the bag from your office that is a clear and direct theft of data. It would be similar to them stealing a file from a desk, but that would actually be less detectable. Remember as the bags are numbered and at that point being expected by Facilities Management there is a clear audit trail. So if our offices are safe for data, then so is the sealed bag.

How do I seal the bag?

Using the numbered zip tie tag provided please thread it through **ALL** of the eyelets of the bag to ensure that the bag is effectively sealed. Or at least as many as are required to prevent it being opened again / anything being taken out.

What is this new Destruction Register?

You will have noticed that there is a new web form (on <http://intranet.eastlothian.gov.uk/shredding>) which asks that you record what has been put into the box. This has not happened before but is part of our obligation to improve how we do Records Management as an organisation under our obligations as part of the Public Records (Scotland) Act.

Who has to use the destruction register?

Ideally everyone. Well, anyone who uses the shredding consoles. If you are destroying something, you should use the web form to record that this has happened.

Does this mean I have to record every single piece of paper?

No. There is no expectation that every single piece of paper will have its own destruction record. However if it is important enough to confidentially destroy it is probably important enough to make a record of the fact you are destroying it.

However if you destroy a whole file – that is definitely worth having its own entry in the register.

So how do I record the single pieces of paper that I need to confidentially destroy?

If at all possible group them together in the destruction record. Even if you don't destroy them all at the same time, you can still collate them together in the record. For example:

- | | |
|--|---|
| ➤ copy correspondence (October 2016) | ➤ Copy invoices 2013-14 |
| ➤ Client contact details
(Week Ending 25/11/16) | ➤ Hard copies from scanning September 2016
/ Scanning Batch 333444 |

So depending on how you work best, for the day to day destructions you do, just once a week or once a month, probably best linked to how frequently you get the bag uplifted, put down an entry / entries about what you have destroyed recently. This should only take a minute.

Isn't it a waste of my time?

No, it isn't a waste of your time. We hopefully have designed the system to be as easy to use as possible, please let us know if there are any problems with it (records@eastlothian.gov.uk) but while we acknowledge it is 'extra' work, it is important for us, as a Council, to demonstrate that we take the management of our records / data seriously. Historically we haven't had any proof of what we destroyed and this is the start of that process.

Why are we doing this?

As I said before this is part of our obligations under the Public Records (Scotland) Act to prove that we are properly managing the destruction of our records, but it also links into our obligations under both the Freedom of Information (Scotland) Act and the Data Protection Act, as both of these pieces of legislation dictate that we are clear about when and how we destroy information. Also if we ever have to provide evidence of what something was destroyed the register will provide that for us.

What happens if I don't record it?

It will become apparent which sections aren't recording things as the uplift records will show which boxes are being used but if there are no matching destruction records it will be clear where there is a gap in compliance.

This is all too complicated. What happens if I stop using the confidential waste boxes?

If any Council employee fails to ensure that confidential waste is handled appropriately that could lead to a breach of the Data Protection Act, or for other sensitive data to be put at risk. This would be investigated and the source of the breach located.

How can I tell if something should be confidentially destroyed or not?

There is a basic guide on how to tell if something needs to be confidentially destroyed or not [here](#).

I don't have a shredding box / console, what do I do?

There is a list of consoles and their locations [here](#). If there is not one in your building / near to you please contact the [Print Unit](#) to discuss how you can securely dispose of confidential documents.

I have a lot of files I want to destroy what should I do?

If you have a large quantity of paper you need to confidentially destroy it is possible to make a direct arrangement with the [Print Unit](#) to deal with this – it may be more efficient than putting things through the Shredding Consoles.

I have more questions about confidential waste destruction – who do I speak to?

For any questions on the principle of what we destroy, why and how please email [Records](#).

For any questions about when you get your box picked up, or about the process email [Mail Room](#).

If you want to get a box, when you don't have one, please email [Facilities Management](#).

Data Protection and Information Security

Two sides of the same coin



Do the online training for Data Protection,
Information Security and Records
Management on Learnpro

IT IS MANDATORY!

A wee recap...

- Personal data
- Sensitive personal data
- Data processing
- Data controller
- Data processor
- Data Protection Principles

The relevant principles

- Principle 7: Take proper technical (IT) and organisational measures against unauthorised or unlawful processing of personal data.
- Principle 8: Do not send personal data to a country outside the EU unless that country has the same type of DPA as we have.

Email

- Housekeeping – don't keep emails forever.
- Save attachments to your server space and remove the content from your email.
- Empty your 'Deleted Items' folder regularly.
- Avoid using names and other personally identifiable information when you can.
- Never store passwords in your email.

Mail merge

- Be careful with mail merge to send a letter to an individual child's parents – verify the address!
- If possible, remove names of parents/carers from mail merge, leave only professionals on there.
- Delete addresses from mail merge when the child leaves the school.
- Get child's address directly from SEEMIS.

The problem with websites and software...

- The 'usual' problem:
 - Using a data processor
 - Data processor loses personal data
 - ICO can fine ELC
 - With a Data Processing Agreement the liability shifts
- The additional problem:
 - Website/software based outwith EU
 - Personal data sent there
 - Breach of 8th DP Principle
 - 'Safe Harbor' agreement invalidated by European Court of Justice
 - What do we do? Either gain written consent or use anonymisation of data

Update, please...???



The problem with holidays

- FOI requests/data subject access requests made beginning of summer holidays
 - 20 days/40 days time
 - Nobody in the school
 - We need an emergency plan!
- over to you!

How can I be secure?

- Always wear your ELC ID badge.
- Comply with ELC policy on passwords (on Elnet).
- Re-read the Acceptable Use Policy (on Elnet).
- Don't leave ELC equipment in vulnerable places.
- Transfer as little data as possible.
- Unsure? Ask!
- Think there's a problem? Report!

Using social media

- Growing part of most people's internet use.
- What can others (pupils?) see on your Facebook?
- Read the ELC Social Media policy (on Elnet).
- Unsure if you should put something online? Don't.
- Corporate Communication can help with advice.
- Don't start something you can't maintain.
- Always have more than 1 administrator.

Using email securely

- Only use your @elcschool.org.uk email for school business.
- Update any forms/websites/newsletter templates.
- Only use Edubuzz for curricular matters with pupils.
- Avoid personal data in emails if possible. Nicknames?
- Never use autoforward rules on email.
- Be wary of any unsolicited emails asking you to 'verify your details' – ask IT.

How do I ask questions?

- Phone the IT Service Desk – 01620 827205.
- Not urgent? Email – itsd@eastlothian.gov.uk
- Curricular matter? ICT Team in Education can assist, David Ramsay 01620 827108 or send email.
- Edubuzz problem? ICT Team in Education can assist, David Gilmour 01620 827114 or send email.

- If in doubt – call IT Service Desk and get it logged.

ELC Security Incidents

Class teacher leaves list of pupil passwords lying about in classroom.

USB memory stick found in meeting room – details of child protection case.

Primary school pupil bypasses security and views adult web sites.

Citizen's bank statements found on ex employee's home PC.

Pupil plants adult images in teachers home directory.

16 laptops lost or stolen over a 3 month period.

Web site defaced.

Employee uses personal unencrypted USB stick to store pupil data, loses stick.





Business Continuity Policy and Management System



Generic Life Cycle

Guidance and Policy Statement Document

2017

Distribution

	Via electronic mail	
Business Continuity Single Points of Contact (SPoC) and deputies	√	
Chief Executive	√	
Deputy Chief Executives	√	
Director	√	
Heads of Service	√	
EPRM	√	

Note: This document will be uploaded onto the Continuity² Business Continuity platform and amended when appropriate to ensure it remains 'fit for purpose'. The Chief Executive, Depute Chief Executives, Director, Heads of Service, Business Continuity Single Points of Contact (BC SPoCs) and their deputies have access to Continuity².

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Glossary

BC	Business Continuity
BCCMT	Business Continuity Crisis Management Team
BCM	Business Continuity Management
BCMS	Business Continuity Management System
BCP	Business Continuity Plan
BC SPOC	Business Continuity Single Points of Contact
CMT	Crisis Management Team
CRT	Crisis Response Team (strategic)
ECC	Emergency Co-ordination Centre
ELC	East Lothian Council
EPRM	Emergency Planning & Risk Manager
GIS	Geographical Information Systems
HSE	Health & Safety Executive
IT	Information Technology
JMH	John Muir House
LA	Local Authority
MCA	Mission Critical Activity (ies)

East Lothian Council Business Continuity Management System

Policy Statement:

Managing Business Continuity (BC) is challenging and we all have a role and function to ensure it works, and works well.

The Civil Contingencies Act 2004 (Contingency Planning) (Scotland) Regulations 2005 *requires* East Lothian Council to ensure it has prepared, as far as is reasonably practicable, plans, to continue to provide critical activities and an emergency response during any emergency or disruptive event. As Chief Executive I have to ensure that East Lothian Council comply with these statutory requirements.

As a result, each Head of Service must ensure the services they are responsible for, maintain BC plans as per the provided template and guidance on the Continuity² software. Each Head of Service must also ensure that their staff understand their role and responsibilities within each BC Plan.

BC is not just about the recovery of IT systems or services, although these are important elements, it is concerned with ensuring the delivery of the Council's core business and providing the best level of service to the public, including support to the old and vulnerable, removing waste, keeping roads clear, providing environmental protection, etc.

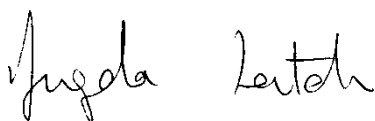
All services have a role, and every member of staff has a responsibility, to make sure the Council can continue to service our communities, whatever the disruption.

The BC process relies on our commitment and teamwork to ensure an effective corporate response. Ensuring the continuity of our services and output is essential, particularly in times of crisis.

I expect everyone to contribute to achieving this objective.

To ensure that this objective is met, each Head of Service will appoint a BC Single Point of Contact (BC SPOC) and deputy who will be responsible for creating, maintaining and exercising their BC plan. Support will be given to all SPOCs and their deputies by the Emergency Planning and Risk Manager who will be responsible for administrating the process and providing advice when required.

It is the responsibility of all Directors and Heads of Services to ensure that appropriate resources are provided to implement this Policy and to ensure that it is properly communicated and understood.



Angela Leitch, Chief Executive January 2017

International Standard ISO 22301

This Business Continuity Management System uses the advice and guidance featured within ISO 22301.

The ISO 22301 is the international standard for Business Continuity management, and builds on the success of British Standard BS 25999 and other regional standards. It's designed to protect your business from potential disruption. This includes extreme weather, fire, flood, natural disaster, theft, IT outage, staff illness or terrorist attack. The ISO 22301 management system lets you identify threats relevant to your business and the critical business functions they could impact. And it allows you to put plans in place ahead of time to ensure your business doesn't come to a standstill. Business Continuity Institute (BSi) 2014

The following definitions are taken from the International Standard ISO 22301:

Business Continuity: a corporate capability. This capability exists whenever organisations can continue to deliver their products and services at acceptable predefined levels after disruptive incidents have occurred.

Business Continuity Management: a holistic process that is used to ensure that operations continue and that products and services are delivered at predefined levels, that brands and value-creating activities are protected, and that reputations and interests of key stakeholders are safeguarded whenever disruptive incidents occur. This is achieved by identifying potential threats, by analysing possible impacts, and by taking steps to build organisational resilience. (A holistic process is one that emphasises the importance of the whole process and the interdependence of the parts that make up that process.)

Business Continuity Management system: is part of an organisation's overall management system. A BCMS is a set of interrelated elements that organisations use to establish, implement, operate, monitor, review, maintain, and improve their business continuity capabilities. These elements include people, policies, plans, procedures, processes, structures and resources.

All of these elements are used to ensure that operations continue and that products and services are delivered at predefined levels, that brands and value-creating activities are protected and that the reputations and interests of key stakeholders are safeguarded whenever disruptive incidents occur.

Business Continuity

1 Introduction

- 1.1 This Business Continuity Management System (BCMS) document is designed to be flexible and remain fit for purpose. It provides the framework for all services to develop their own Business Continuity Plan (BCP). The plans completed will be hosted on the **Continuity²** software.
- 1.2 The BCMS has been designed using guidance in the ISO 22301. Note that BCMS is not an IT Recovery Plan – although Information Technology has a major influence in business continuity planning, the system itself is about being resilient and establishing critical services as well as safeguarding reputation and public image.
- 1.3 Business Continuity Management should be a consideration in all new policies and procedures and remain as a living function, changing to meet the demands of all aspects of corporate business.
- 1.4 The Civil Contingencies Act 2004 (Contingency Planning) (Scotland) Regulations 2005 place several duties on Category 1 responders, including:
- The ability of category 1 organisations to continue to be able to perform their functions in the event of emergencies.
- 1.5 East Lothian Council is a category 1 responder and as a result must comply with these regulations.

2 Aim

- 2.1 **The aim of the ELC BCMS plan is to provide the foundation on which services can build robust, effective and flexible Business Continuity plans to affect a prompt return to normality following a catastrophic incident.**

3 Objectives

- 3.1 **The objectives are to:**
- identify mission critical activities (MCA)
 - identify single points of blockage to services and/or functions
 - identify the location of alternative premises should relocation be required
 - give an indication of minimum staffing requirements for departments to continue to function
 - indicate minimum IT requirements
 - indicate minimum telephone lines required
 - outline furniture requirements
 - give an indication of the maximum tolerable period of disruption
 - ensure suppliers of critical equipment and / or services are identified and have their own BC plans in place

4 The Business Continuity Management (BCM) Lifecycle

4.1 Generic Life Cycle



Generic Life Cycle

4.2 Management Practices and Technical Practices

Management Practices

- Policy and Programme Management is at the start of the Business Continuity Management (BCM) Lifecycle. It is the Professional Practice that defines the organisational policy relating to Business Continuity, and how that policy will be implemented, controlled and validated through a BCM programme.
- Embedding is the Professional Practice that continually seeks to integrate BC into the day-to-day business activities and organisational culture.

Technical Practices

- Analysis is the Professional Practice within the Business Continuity Management (BCM) Lifecycle that reviews and assesses an organisation in terms of what its objectives are, how it functions and the constraints of the environment in which it operates.
- Design is the Professional Practice within the BCM Lifecycle that identifies and selects appropriate strategies and tactics to determine how continuity and recovery from disruption will be achieved.
- Implementation is the Professional Practice within the BCM Lifecycle that executes the agreed strategies and tactics through the process of developing the Business Continuity Plan (BCP).

- Validation is the Professional Practice within the BC Lifecycle that confirms that the BCM programme meets the objectives set in the BC policy and that the organisation's BCP is fit for purpose.

5 Insurance Arrangements in Place

- 5.1 Risk transfer to external insurance companies may reduce the costs associated with a damaging event. The main financial cost to the Council of managing the risk will then relate predominantly to insurance premiums and excesses. Effecting appropriate insurance cover may not always be the most effective course of action. The Council therefore attempts to reach a balance between self-insurance (and thus meeting the direct costs of many low value, but more frequent and predictable losses from Council funds) and external insurance in respect of disaster or catastrophic type losses.
- 5.2 ELC has a range of insurance policies in place to manage those risks that are unattractive to self-insure. The Council self-funds almost all property or liability losses, with insurance cover only for critical/catastrophic losses. The majority of losses are met from the Council's insurance fund and the cost of this is apportioned to departments by exposure, and weighted according to claims experience.
- 5.3 Insurances in place include:
- Property policy (material damage and business interruption) – covering all ELC buildings and their contents. The policy also provides cover against loss of income and increased cost of working at Council properties in the event of damage.
 - Cross Class Policy (public liability, employers liability and motor vehicles including property damage to vehicles and liability to third parties) – indemnifies ELC in respect of all sums it may become legally liable to pay, primarily from accidental injury to any person or accidental damage to property.
 - Engineering insurance – in respect of machinery and plant items (eg boilers)
 - Other policies include personal accident, fidelity guarantee (fraud), group travel (business and schools), official's liability, libel and slander and professional indemnity.

6 The Corporate Risk Register

- 6.1 The Corporate Risk Register shows the major corporate risks identified. These risks could compound any BC incident and understanding Corporate Risk will assist in the development of Service Unit BC plans. All BC Single Points of Contact and their deputies must ensure they are familiar with this register and the risks contained within.

7 Service Risk Registers

- 7.1 Service Units have produced service risk registers identifying High/Very High risks. These will be reviewed and signed off by Executive Directors on an annual basis and will incorporate all levels of risk for individual services.

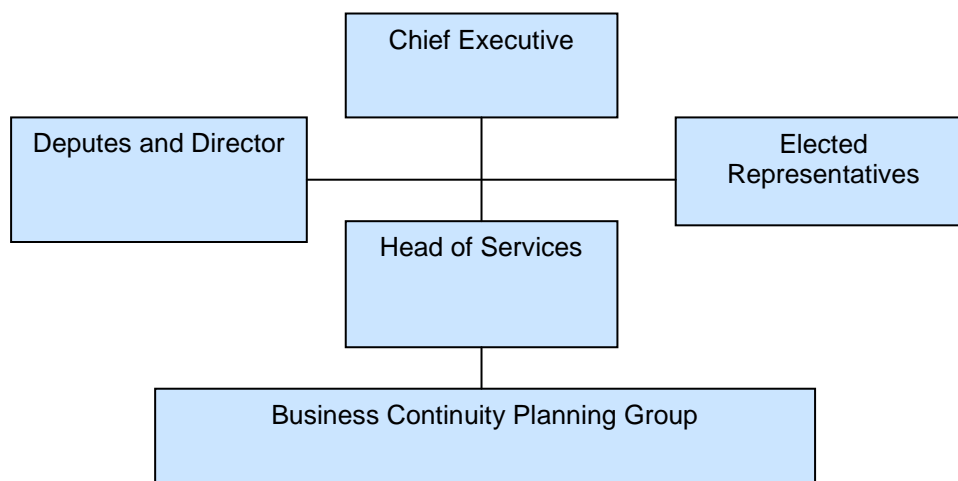
8 Business Impact Analysis

- 8.1 A Business Impact Analysis (BIA) predicts the consequences of disruption of a business function and process and gathers information needed to develop recovery strategies. Operations may also be interrupted by the failure of a supplier of goods or services or delayed deliveries. There are many possible scenarios which should be considered.
- 8.2 Identifying and evaluating the impacts and disruptions on business provides the basis for investment in recovery strategies as well as investment in prevention and mitigation strategies

8.3 A Business Impact Analysis (BIA) tool is contained within the Continuity² software.

9 The East Lothian Council BC Management Structure

9.1 Diagram showing ELC BC management structure.



9.2 The Business Continuity Planning Group is a working group which meets annually to discuss Business Continuity (BC) and BC plans. Members of this group are the BC Single Points of Contact (BC SPOCs). Should the SPOC be unable to attend, their deputy should represent them. Additional meetings will be called if required.

10 Performance and Improvement

10.1 Service areas are required to test and exercise their BC plan on an annual basis. The BC Plan will not be 'signed off' by the Head of Service unless evidence of this action is displayed within the reviewed plan.

10.2 It would reflect best practice if services worked together and exercised their BC plans simultaneously. The EP&RM will organise and run a full BC exercise for ELC when appropriate.

10.3 Guidance on 'exercising' can be found within the distributed book, *'Business Continuity for Dummies'* (provided to all SPoC) and the Preparing Scotland document, *'Scottish Exercise Guidance'*. The latter document is available on Continuity² and provides excellent guidance on the following types of exercises:

- Discussion
- Table Top
- Command/Control Post
- Live

10.4 All staff must be aware of Business Continuity within East Lothian Council and to assist this process an elearning package has been produced and is available through LearnPro. Business Continuity Single Points of Contact should encourage their staff to view this elearning package.

10.5 Post-event and post-exercise reports should be produced, with lessons learnt being incorporated into the BC plans. All such activity should be fully documented for evidential/audit purposes within the plan and on Continuity². The Emergency Planning and

Risk Manager (EPRM) must be sent all 'lessons-learned'. The EPRM will ensure 'lessons learned' are highlighted at the annual Business Continuity Group meeting, and noted accordingly.

11 Continuity²: Business Continuity Software

11.1 The Continuity² application is designed to assist Business Continuity SPoCs in their day-to-day role, by simplifying the creation, maintenance and support of a business continuity management system for East Lothian Council.

11.2 Continuity² provides a 'Management information' software system for East Lothian Council (ELC) and includes the following applications:

<p>Login and Home Screen</p> <p><i>Logging into the web application and recovering passwords</i></p>	<p>Organisation Structure</p> <p><i>Configuring the tool to meet your organisations structure</i></p>
<p>Dynamic Templates</p> <p><i>Creating, editing and deploying new plan templates</i></p>	<p>Plans and Call Lists</p> <p><i>Creating plans and call lists for incident response</i></p>
<p>Business Impact Analysis</p> <p><i>Configuring and deploying BIA in your organisation</i></p>	<p>Plan Exercising</p> <p><i>Exercising the plan and documenting observations, recommendations and actions</i></p>
<p>Document Management System</p> <p><i>Uploading and maintaining documents for your organisation</i></p>	<p>Document Control</p> <p><i>Maintenance of document versions through review, sign off and automated distribution</i></p>
<p>Management Information</p> <p><i>Outputting live management information about the organisations BCMS</i></p>	<p>Contact Training</p> <p><i>Providing training to contacts with responsibilities in the BCMS</i></p>
<p>Corrective Action</p> <p><i>Creating and monitoring observations, recommendations and actions</i></p>	<p>Reports</p> <p><i>Output of various reports on the BCMS</i></p>
<p>Compliance</p> <p><i>Monitoring compliance against defined standards</i></p>	<p>Managing Contacts</p> <p><i>Uploading and updating contact data</i></p>
<p>Manage Auditing</p> <p><i>Creating, editing, issuing and managing audits</i></p>	<p>Mobile Application and Native Applications</p> <p><i>Using the mobile functionality to support the BCMS</i></p>

- 11.3 The Council Management Team will have access to all sections of Continuity².
- 11.3 All East Lothian Council Business Continuity Single Points of Contact (BC SPOCs) and their deputies will have access to Continuity². The BC SPOCs will be responsible for completing the template BC plan for their service on Continuity² ensuring it remains 'fit for purpose', completing an annual review of their BC plan and amending/updating the document within the agreed time-table (appendix 1). **The SPOCs will be notified by e-mail automatically from Continuity² as documents are due for review.** The agreed time-table will include forwarding, through Continuity², the service BC plan to the 'Head of Service' to have it 'signed off'. The Head of Service will either 'sign off' the BC plan and forward to the EPRM or return it to the BC SPOC for further revision. The EPRM, once notified through Continuity² that the BC plan has been 'signed off', will notify the Chief Executive within the agreed time-table.
- 11.4 Each BC SPOC and their deputy will receive Continuity² training notes on how to use the software.
- 11.5 Guidance documents and forms will also be accessible through Continuity².
- 11.6 The Continuity² software is third party and can be accessed on any computer, tablet and/or mobile device.
- 11.7 It should be noted that all ELC Emergency Response plans have been uploaded onto Continuity².

12 East Lothian Council Business Continuity Time-Table

- 12.1 The East Lothian Council time table has been agreed with the Chief Executive and is to be strictly adhered to.
- 12.2 The agreed annual time table can be found in Appendix 1.
- 12.2 Reminders will be generated by Continuity².

13 Records Retention

- 13.1 In line with the Keeper of the Records of Scotland's (The Keeper) obligations under the Public Records (Scotland) Act 2011 (the Act) guidance has been issued to support authorities with regard to business continuity and vital records.
- 13.2 It is recommended that public authorities have a business continuity plan and that they can identify key records that facilitate the operation of the authority. The legislation states: 'A business continuity and vital records plan serves as the main resource for the preparation for,
- 13.3 This applies whether the records kept are paper based, electronic or, most likely, a hybrid of the two. All ELC Business Continuity documentation will be retained within **Continuity²**.
- 13.4 It is important to note that the Keeper will not want to see any information, policy documents or other material that might compromise the security of a public authority.
- 13.5 The Vital Records Retention policy must be adhered to within East Lothian Council with regards to all document storage. Full details of the Records Retention process can be found within Appendix 2.

14 Contracts, Tenders and Procurement

- 14.1 Business Continuity should be embedded into the processes of contracts, tenders and procurement, with confirmation being requested from suppliers of their Business Continuity planning. Details of alternative suppliers should be kept where possible.

15 Accountability and Responsibility: Planning Stage

- 15.1 The Chief Executive:

- The East Lothian Council, Business Continuity process is completed as described and detailed within this Management System guidance. BC plans will only become live once signed off by the Chief Executive.

- 15.2 The Depute Chief Executive's for Resources and People Services and Partnership and Community Services and the Director of the East Lothian Health and Social Care Partnership are responsible and accountable for:

- Ensuring that all service Business Continuity plans are completed and submitted on time and that Business Continuity is promoted throughout.

- 15.3 Heads of Service are responsible for:

- Promoting Business Continuity Management.
- Ensuring annual Business Continuity exercises are completed to test the plan.
- Ensuring Business Continuity service plans are completed and fit for purpose on an annual basis, as per the agreed time table (appendix 1).
- Ensuring the Business Continuity Single Points of Contact (BC SPOCs) are identified and maintained and that each SPoC has a deputy.
- Checking the Business Continuity Plans, submitted through Continuity² by their BC SPOCS, as per the agreed timetable.
- Returning BC plans to the SPoC, through Continuity² if not completed.
- Submitting the validated BC plans to the Emergency planning and Risk Manager once completed through Continuity².

- 15.4 Business Continuity Single Points of Contact (BC SPoC) are responsible for:

- **Ensuring BC Plans, for critical processes/activities (as identified via the BIA process), are developed, reviewed and tested in line with the requirements of the BCMS**
- **Initiate the review and signoff process for BC Plans**
- **Maintenance of call lists for their area of responsibility – ensuring they are reviewed and updated**
- **Conduct tests of relevant staff call lists**
- **Maintenance of the associated documents area for their plan(s)**
- **Understand the BIA process e.g. completing activity-level analysis, assigning analysis to activity owners, review and signoff of BIAs**
- **Ensuring BIAs are completed for their area of responsibility**
- **Regularly complete BIA reviews (as required by the BCMS programme)**
- **Update BC Plans to reflect the latest BIA output**
- **Assist with the exercising of BC Plans in line with the requirements of the BCMS Programme**
- **Create and invoke plan exercises (add participants, set/edit exercise objectives)**
- **Post-exercise reporting (capture observations/recommendations and actions) including report review, signoff and distribution**

- **Understand plan invocation/ incident management functionality e.g. call list and incident management team communications**
- Adhering to the agreed time table as detailed within Appendix 1.
- Attend the annual ELC BC group meeting.
- **Ensure all team members are aware of the plan and understand their roles and responsibilities in the event of a plan invocation or plan exercise**

15.5 Business Continuity Single Points of Contact, deputies are responsible for:

- Assisting the BC SPOCs when required.
- Deputising for the BC SPOC as required.
- Be able to invoke the BC plan, if required, if the BC SPOC is unavailable for whatever reason.
- Attending the annual ELC BC group meeting should the SPoC be unavailable to do so.

15.6 The EPRM is responsible for:

- Developing, producing and maintaining the BC Management System guidance.
- Drafting the annual BC timetable for the CMT.
- Chairing the annual ELC BC group meeting.
- Advising the BC SPoCs, providing guidance and reviewing plans where required.
- Co-ordinating the BC plans and submitting them to the CE, through Continuity², for signature.
- Ensure the Continuity² software used for BC purposes remains 'fit for purpose'.

16 Accountability and Responsibility: Invoking BC Plans

16.1 The Chief Executive, Deputes or Director will be responsible for invoking the ELC BC plans based on the information received from a Head of Service.

16.2 ***A full description of the process to be followed when an incident occurs is contained within Appendix 3.***

16.3 As per Appendix 3 if the CE, Depute or Director decides that BC Plans are to be invoked, consideration must be given to forming a Crisis Response Team as detailed within the BC Yellow Pack. The CE or Director will chair this group and the following functions must be considered:

- Media
- Human Resources
- Information and technology
- Facilities
- Health and Safety
- Emergency Planning and Risk Manager (to provide advice and guidance if required)
- Other functions as dictated by the circumstances

16.4 The Business Continuity Single Points of Contact (BC SPoCs) for the service that is invoking its BC plan must follow their plan and use, as required, the forms contained within Continuity².

16.5 The BC SPoCs must ensure their staff are regularly briefed as to the current position, their role and the future strategy.

16.6 The BC SPoCs must ensure their Heads of Service are regularly briefed as to ongoing operational matters and remain available for information sharing.

Appendix 1: Business Continuity Timetable

Action by:

Executive Directors / Chief Executive
Head of Service
BC SPoC
Emergency Planning & Risk Manager

Action	By Whom	By When	Remarks
<p>Review existing Business Continuity Service Plan</p> <p>Note: The BC Plan is a living document and should be changed should circumstances dictate.</p>	BC SPoC	December	Records of review and decisions will be retained for audit purposes on Continuity ² .
Disseminate plans to staff members. Access can be given on a 'read only' basis through Continuity ² .	BC SPoC	When review complete	Ensure all staff are aware of plan activation procedures and responsibilities.
Exercise (refer to guidance on Continuity² if required)	SPoC and staff from the Service Unit the plan is written for. Head Of Service should be included.	When required and definitely at least once prior to review.	All plans require to be exercised by key staff members . All action completed must be recorded on Continuity ² .
First Sign off	Head of Service	January	Forward to Head of Service through Continuity ² .
Final Sign off	Chief Executive / Executive Director	April	Report submitted by EPRM confirming process has been adhered to.

Appendix 2: Vital Records & Business Continuity – Summary

The concept of 'vital' is context dependent.

What is vital at one point for one department will not hold the same significance for another department, or even for that same department in a few weeks, it all depends on what the information is and what purpose it serves.

A vital record is one without which you would either find it difficult to, or would be totally prevented from, doing your work.

To determine this context you will need to think about your business processes:

- What is your team's core function / what are its key activities?
- What information do you require to be able to undertake that function / complete that activity?
- Where is that information stored / how is it held? (this applies to all information regardless of its format: paper, electronic, microform, etc.)

Once you have done that the next key stage is to think about what would happen if you couldn't access the information:

- How long could you continue to work without that information?
- What is it possible for you to still do without access to the older information?
- Is it possible to re-create the information from other sources?
- Will there be new information created that needs to be captured and linked to the previous information if possible later on?

You will need to determine, based on local knowledge of the information and its relevance to different activities what the risks associated with this data not being available will be.

You will need to determine who is responsible for this data – this can be the same individual who is identified in the Retention Schedule or it can be another member of staff more closely connected to that actual processes. But it is key to know who should know what to do about this particular aspect. Over the page is a matrix to help you assess the different risk factors associated with each different type of information / record that you hold.

The types of risks that occur can range from power failure to fire to inability to access buildings, or damaged or lost equipment. You will need to think about what could go wrong to ensure that it is being avoided.

Once you have done this it will be necessary to determine what steps you can / should take to reduce the risks to the information in question and then build these processes into your business continuity plan.

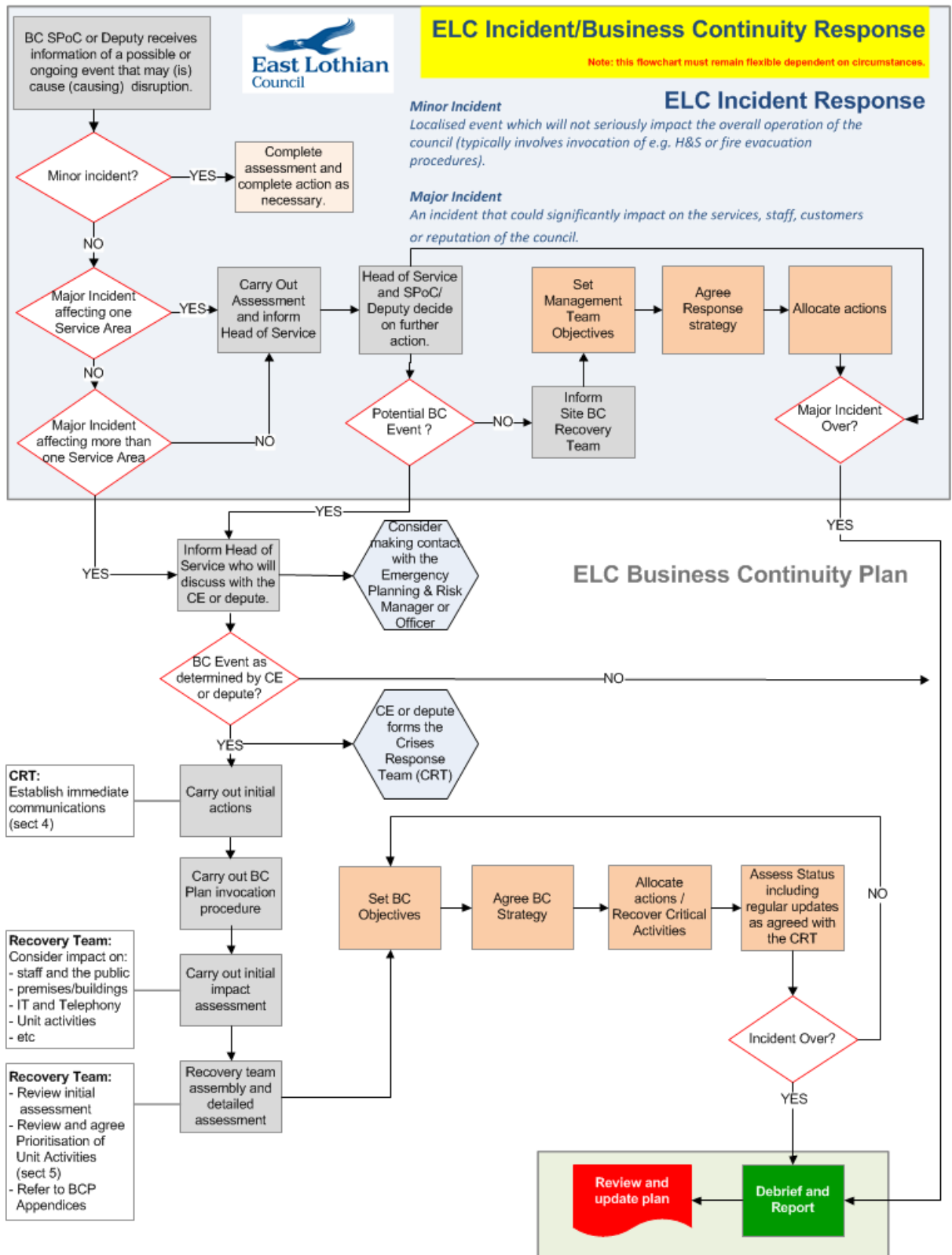
Risk Assessment Matrix

Factor	High	Medium	Low	Very Low
How serious would the loss/unavailability of the information be in the short term? (Hours)				
How serious would the loss/unavailability of the information be in the medium term? (Days/Weeks)				
How serious would the loss/unavailability of the information be in the long term? (Forever)				
How serious would it be if the records were lost / stolen?				
How much would it cost / how great would the effort be to protect these records:				
- From fire				
- From water				
- From theft				
- From accidental deletion / destruction				
How great is the quantity of records that would need to be protected?				
How likely is it that this quantity will increase?				
How likely is it that this will decrease?				
How likely is it that another copy exists elsewhere?				

This matrix will not tell you what is vital but will help you see how to decide which records are vital and which are of lower importance.

If you have any questions or concerns about this process you can obtain advice from the Records Manager (8223) or the Emergency Planning & Risk Manager (7779).

Appendix 3: ELC Incident/Business Continuity Response Flowchart



Extract from Business Continuity Software

Step 1 activity Description	Step 2 Impact Analysis	Step 3 Impact Description	Step 4 Min Level of Resumption	Step 5 Critical Time Period	Step 6 Internal Dependencies	Step 7 External Dependencies	Step 8 Recovery Strategy	Step 9 Strategy Tasks	Step 10 Resources Over Time
Step 11 Applications RTO / RPOs	Step 12 Vital Records	Step 13 Additional Questions & Submit							

These steps are compulsory for the creation of any activity within the Business Continuity System. As you can see Step 12 requires information on the precautions relating to the management of vital records related to that activity.



Licensing Administration and Democratic Services Business Continuity Plan

2016

LICENSING, ADMINISTRATION AND DEMOCRATIC SERVICES UNIT BUSINESS CONTINUITY PLAN 2014

Version 1.0

Name of Nominated BC SPOC

Kirstie MacNeill

Signature of Head of Service

.....Jim Lamond.....Date:...8 March 2016.....
(I confirm that I have read and that I am satisfied with this plan)

Signature of Director.
Date:.....

(I am satisfied with the plan and that:
a all appropriate staff have been briefed
b that elements of the plans have been exercised during the
past year)

Distribution List

Name	Role	No of copies
Jim Lamond	Head of Service	1
Kirstie MacNeill	Service Manager/SPOC	1
Lel Gillingwater/Jill Totney	Team Managers – Democratic Services	2
Alex Fitzgerald	Records Manager	1
Ewan Ritchie	Licensing	1
Lillian Pryde	Elections/Community Councils	1
Hazel Boak	Civic Events	1
Ruth Fyfe	Archivist	1
Fran Woodrow	Archivist	1
Sandy Baptie	Emergency Planning and Risk Manager	1

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1. INTRODUCTION

This business continuity plan details the activity that will be undertaken by the service in the event of a significant disruption impacting the ability the service to conduct is routine business. The plan will only be invoked with the strategic authorisation of a Depute Chief Executive, the Crisis Management Team (CMT) or the Emergency Co-ordination Centre (ECC).

East Lothian Council’s business continuity methodology reflects the best practice, as set out in ISO 22301 and essentially follows over a timeline a series of REACTION, RESPONSE AND RECOVERY ACTIONS as shown in the table below.

1.1 The process over a timeline for invoking the BCP

Local Reaction Becoming aware of a significant situation	Tactical Response <i>Site specific</i> emergency response	Operational Recovery <i>Function specific</i> activity – starting with a verb.
<ol style="list-style-type: none"> 1. Apply usual H&S or Fire Evacuation procedures as appropriate. 2. Notify on site senior management of situation. 	<ol style="list-style-type: none"> 1. This is the point where it is evident the combined responses of more than one department are necessary to resolve a significant event. 2. Consideration must evaluate whether this situation has the potential to disrupt usual activity for at least more than one day. 3. A site specific emergency response plan managed by the delegated most senior person involving a limited number of specified personnel with the focus on Health & Safety, Facilities and ICT. 	<ol style="list-style-type: none"> 1. Only invoked upon the direction of the Executive Director, the Crisis Management Team (CMT) or the Emergency Co-ordination Centre (ECC) 2. Involves all department personnel in a range of activities. 3. Maintain mission critical activities. 4. Apply pre agreed department recovery strategy. <ol style="list-style-type: none"> a. Move to alternative location section to strategy
<ol style="list-style-type: none"> 3. Once outside of immediate danger area agree: <ol style="list-style-type: none"> a. Significance of event b. Who is in charge c. What happens now? d. Is a response phase require?. 	<p>First couple of hours – fix the hazard!</p> <ol style="list-style-type: none"> a. What’s happened and how long will it last questions. b. A tactical response – invoking delegated authority locally and liaising with emergency services as necessary. 	<p>Could take up to 15 days to be fully mobilised</p> <ol style="list-style-type: none"> a. Pick up immediate communications b. Highlight mission critical activities – as per BIA c. Implement work around procedures necessary to maintain critical services

- d. Engage critical ICT
- e. Engage critical third party support
- f. Engage mutual aid

2. EXAMPLE TRIGGER EVENTS

Type of Incident	Level 1 (Local)	Level 2 (Minor) INVOCATION CONSIDERED	Level 3 (Major) FULL BCP INVOCATION
Natural emergencies causing building damage/collapse	Minor structural damage – no evacuation necessary	Minor structural damage – evacuation limited and some relocation necessary	Major structural damage – evacuation and relocation necessary
Severe weather, eg excessive rain, snow, wind, ice, cold	No building damage – some staff absence, minor disruption to normal activities	Minor building damage/serious disruption to normal activities. Significant staff disruption	Serious building damage – serious disruption to normal activities. Significant absence of staff

Fire	Minor damage to rooms – no relocation necessary. Little or no loss of information. Rooms temporarily out of use	Medium damage to rooms/accommodation. Can reorganise internally. Little loss of information.	Major damage, loss or part or whole of the building. Significant loss of information
Flood	Minor damage to rooms or accommodation. No or little loss or damage	Medium damage to rooms or accommodation. Some loss or damage	Major damage and disruption to rooms or accommodation. Significant loss or damage
Civil disorder	Some disruption to normal activities. Some staff absence	Serious disruption to normal activities. Significant staff absences	Prolonged and sustained disruption to normal activities. Significant numbers of staff unable to attend work
Electricity/water supply failure	Affecting <5% of population	Affecting 10-35% of resident staff	Affecting >35% of resident staff. Causing serious disruption
Explosion	Small localised blasts that can be isolated. Causing limited damage, no injuries.	Medium blast. Causing minor damage and or fire. Minor injuries	Medium/major blasts. Significant damage and disruption. Major injuries.
Gas leaks	Minor leak causing evacuation	Major leak causing evacuation and injuries.	Major leak causing evacuation, injuries and death
Medical epidemics	Causing staff absences leading to disruption of services	Significant disruption of activities and causing staff absences.	Major disruption of service and major absences of staff.
Chemical release or contamination	Minor contamination. Low risk to people	Minor and uncontained. Risk of fire and corrosion and toxic to health.	Major and uncontained. High risk of fire, explosion or pollution, serious health risk.
Biological incident	Minor and contained. Low risk to people.	Minor and uncontained. Serious risk to health. HSE interest	Major and uncontained very infective and rapid acting
Adverse public interest	Local press interest	Significant regional press interest	Interest from national press
Computer system failure	Affecting <5% of employees	Affecting 10-35% of employees	Affecting >35% of employees
Communications failure	Affecting <5% of residents	Affecting 10-35% of residents	Affecting >35% of residents
Death or serious injury	Serious injury	Multiple serious injuries of death	Multiple deaths and serious injuries

3. AIMS, OBJECTIVES & PLANNING ASSUMPTIONS

Following a significant disruption event that threatens the operational effectiveness of the business unit the Business Continuity Plan will be invoked with the following aims and objectives:

Aims	Objectives	Plan Assumptions
<ul style="list-style-type: none"> Maintenance of mission critical activities Agreed reduction in non mission critical activity for an agreed period of time 	<ul style="list-style-type: none"> Implementation of department coordinated actions to ensure work arounds and recovery Full operational control should be regained within 15 working days. (This is not to imply the same level of service will be provided as prior to the incident.) 	<ul style="list-style-type: none"> REACTION & RESPONSE phases completed already – emphasis now on RECOVERY Access to agreed levels of ICT connectivity and data (see annex table) Agreed levels of resilience in terms of identified personnel / deputies able to maintain critical roles (see annex table) Pre-agreed third party / mutual support (see annex table)

4 PRIORITISATION OF SERVICE UNIT ACTIVITIES

In accordance with the business impact analysis all service activities have been prioritised into four categories. As a result available resources in the event of a significant disruption are channelled to maintaining the mission critical activities before attempting to restore any remaining activities. The classification of activities is shown in the table.

Very High	Within 1 hour day or night	The Business Continuity Plan details the actions necessary to coordinate the management effort and maintain mission critical activity.
High	Within 1 working day (including weekends and public Holidays)	
Medium	Within 1 working week	
Low	From 2 weeks	

5 ROLES AND RESPONSIBILITIES

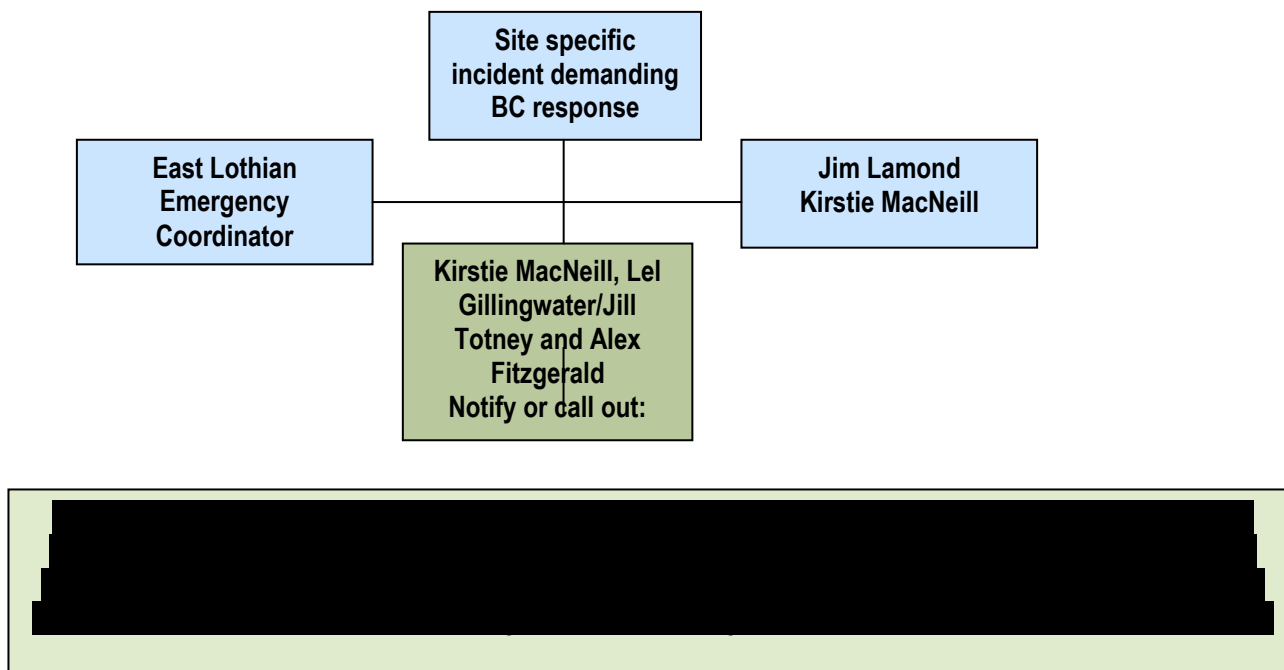
5.1 Contact List – establishing immediate communications

In the event of the Unit BCP being invoked, the Crisis Management Team will coordinate department to department communication and resource allocation where required. Within the Service Unit the following personnel must be informed and manage the recovery activity.

Designation & Role	Name & work email address	Usual Location	Mobile Number	Notified by
BCP SPOC / Deputy SPOC Internal coach to Unit Director – providing guidance and assistance in the implementation of the plan	Kirstie MacNeill (SPOC) kmacneill@eastlothian.gov.uk	John Muir House 01620 827164	██████████	Location emergency Head of Unit or Service
	Alex Fitzgerald (Dep SPOC) afitzgerald@eastlothian.gov.uk	John Gray Centre	██████████	
	Lel Gillingwater (Dep SPOC) lgillingwater@eastlothian.gov.uk	John Muir House	██████████	
	Jill Totney (Dep SPOC) jtotney@eastlothian.gov.uk	John Muir House	██████████	
Head of Unit Ensure the applicability of the Service Unit's BCP, that it is fit for purpose. In the event of plan invocation, oversee its use and provide regular status briefings to Head of Service.	Kirstie MacNeill	John Muir House	██████████	BCP SPoC Head of Service
Head of Service Provide assurance to the Director that the Service has developed and is maintaining an effective level of resilience by implementing mitigating actions. In the event of plan invocation summarise any issues or actions	Jim Lamond	John Muir House	██████████	BCP SPoC Heads of Units

requiring cross service support.				
Emergency Planning and Risk Manager	Sandy Baptie sbaptie@eastlothian.gov.uk	John Muir House 01620 827779		As Circumstances dictate

5.2 Callout Cascade / Communication Flowchart for operational recovery
(Please insert, in order of call out priority – the Unit BC Coordinator or deputy initiates the process)



5.3 Contact details for outside contractors/external organisations who you may need to notify if your BC plan is invoked

Name of Contractor	What do they provide	Address	Contact Number	Who will contact them?	Do they have BC plans in place
Adare	Postal vote provider Ballot paper provider	Park Mill Clayton West Huddersfield West Yorkshire HD8 9QQ	01484 863411	Lilian Pryde/ Hazel Boak	Yes, copy on file
Halarose	Electoral registration, management and postal vote system	Beechwood Court Long Toll Woodcote Oxfordshire RG8 0RR	01491 682120	Lilian Pryde/Hazel Boak	Yes, copy on file
Jadu	eGov Committee Management System	Universe House 1 Merus Court Leicester LE19 1RJ	01162 227242	Lel Gillingwater/Jill Totney	Yes, copy on file
Northgate	Licensing software	Northgate Public Services 3rd Floor 163 West George Street Glasgow G2 2JJ	44 (0) 8450 705 577 or http://www.pscs.northgate- is.com/	Debbie Elworthy/Maree winter/Gillian Herkes	Yes
Canon (Therefore)	Document Management				

	software				
John Gray Centre Website	Website hosts	James Grimster Orangeleaf Systems Ltd 1 – 2 Barker Street Shrewsbury SY1 1SB	01743 352000 http://status.collectionsbase.org.uk	Alex Fitzgerald	Yes

6 RECOVERY STRATEGY

Personnel		Information Technology	Facilities														
<p>Significant reduction of the workforce</p> <p>All staff performing functions as part of a Mission Critical Activity, (MCA), should be shadowed by another nominated member of staff. In the absence of the Senior Officer this member of staff will be responsible for the continuity of that part of the service.</p>		<p>Where resources and information remain accessible relocated staff will have access to the resources and information necessary for carrying out their tasks.</p> <p>A desk at an alternative work area will comprise desk computer and telephone</p> <p>IT can provide support in retrieving information when required or accessing other networks. This support will be on a priority basis and manual systems must be available to be used for at least 5 days.</p> <p>Some but not all-confidential client / business information is stored on the server. Where this involves payment of grants alternative arrangements for setting up, recording and making payments might be required.</p> <p>Individual work files stored by staff on hard drives without backup might not be available. It is essential that all important work is backed up and stored elsewhere, e.g. server or other memory storage device</p>	<p>Staff should report to alternate work locations as directed. Some staff that have home working capability (laptops) should employ this during the disruption period.</p> <p>Desks will be provided on a hot desk principle rather than allocated to specific individuals – this allows resource sharing and allocation as the Service Unit responds to its recovery demands.</p>														
<p>Staffing levels that would trigger business continuity measures are</p> <ul style="list-style-type: none"> 1 x Records Management 0 x FOI/DP 1 x Committees 2 x Members Services Support 2 x Executive Support 1 x Election Support (2 during critical election period) 4 x postal vote during critical election period 0 x Licensing 0 x LSO 0 x Landlord Registration/HMO 																	
<p>Staff will report to alternate workplaces as directed.</p> <p>Staff briefings will be held after the BCP is invoked and at regular intervals by the Head of Service.</p>			<table border="1"> <thead> <tr> <th>Critical Activities</th> <th>Alternative Location</th> <th># of staff</th> </tr> </thead> <tbody> <tr> <td>Elections</td> <td>JGC (archives)</td> <td>100%</td> </tr> <tr> <td>Executive Support</td> <td>With CMT members</td> <td>50%</td> </tr> <tr> <td>Members</td> <td>With</td> <td>50%</td> </tr> </tbody> </table>			Critical Activities	Alternative Location	# of staff	Elections	JGC (archives)	100%	Executive Support	With CMT members	50%	Members	With	50%
Critical Activities	Alternative Location	# of staff															
Elections	JGC (archives)	100%															
Executive Support	With CMT members	50%															
Members	With	50%															

Information on travel to work and child care arrangements should inform decisions team leaders make when relocating individual members of staff. It is important that, where staff volunteer this information, it is updated when required and confidentiality is respected at all times.	Records Manager Team Manager – Democratic Services Service Manager - LADS	Support	Councillors	
		Clerk to AST	Home/JGC (archives)	100%
		Committees	JGC (archives)	25%
		Access to Record store	TBC	10%

Service Unit mission critical – IT applications – recovery timeline in the event of a catastrophic failure of IT capability

	Phase One within 24 hours	Phase Two within 72 hours	Phase Three within 10 days
ELC hosted applications	Email – to communicate	Intranet	
Third party hosted applications	AvantGuard Halarose (during critical election periods otherwise Phase 3)	eGov (Jadu) John Gray Centre Website Northgate	CALM - archives Canon Therefore
Web accessed applications	PanelPal Chirp	Landlord registration (Scottish Government) www.landlordregistrationscotland.gov.uk	

7 SERVICE UNIT BUSINESS CONTINUITY TOOL KIT

Department coordination - standard recovery actions

Ongoing management

Communicate – regularly brief:

- Crisis Management Team (CMT) via the Department's identified single point of contact staff, local community and stakeholders via CMT
- recovery teams of your requirements (ICT., Facilities)

Assess impact and resources:

- staff at various locations
- premises
- I.T. / data network / phones
- suppliers
- work in progress / customers

Establish Priorities:

- staff safety
- work load / work in progress
- future activity
- accommodation
- access to vital records

Recovery day one

Manager:

- receive information from Emergency Response Team concerning any injury to staff and / or extent of damage
- engage assistance of BC SPOC
- assess impact on staff and the business area / provision of services and department functions including IT capability
- instruct team leaders to list immediate needs
- implement record – use Form A
- provide CMT with resource availability information
- implement mission critical recovery actions as per card overleaf

Team Leaders:

Operations:

- organise priority functions using Green Pack
- review diary commitments for next few days and need to fulfil
- review critical processes and activities
- establish the extent of lost work in progress
- draw up work plans to satisfy the key priorities
- establish clear record of employee locations and contact details
- route all communication scripts via CMT

Recovery day two to three

Manager:

- hold team meeting at suitable location to detail recovery response
- make schedules of critical work to be done and due dates
- liaise with I.T. regarding replacement computer equipment
- agree with team those responsible for work programme and those implementing administrative assistance
- reconstruct work in progress, as far as possible
- familiarise yourself with where your reduced department will be temporarily based

Team Leaders:

Operations:

- issue agreed departmental information to be included in internal communiqué
- advise Recovery Coordinator at the alternate location of your telephone extension numbers
- progress reports to the Management Team daily
- use Forms B, C, D & E
- deal with all incoming telephone calls and e-mail.
- inform third parties of new working location and contact details

Recovery week one

Manager:

- maintain clear communication channels with employees
- manage day-to-day activities at recovery location
- agree with Crisis Management Team any additional equipment required to ensure return to normal
- recover / salvage if safe to do so valuable equipment, documents, records, personal effects, work-in-progress

Team Leaders:

Operations:

- review work patterns, and who is in, or out.
- implement best efforts to re-establish workflow using I.T. and documentation
- re-organise and manage team diaries
- assist in the set-up of the systems
- agree catch-up on backlog if necessary
- identify and record medium-term

- recall of offsite information

Organise Capacity:

- implement managed recovery in conjunction with colleagues and infrastructure teams
- plan floor layouts
- consider home working
- I.T. accessibility
- work-around methods

Monitor and Manage:

- work load delivery
- migration to temporary premises
- employee productivity /morale
- return to normality
- thank you to all staff
- revise Business Continuity Plan

Staffing:

- notify appropriate staff to attend alternative / temporary work area / location or work from home – use GP2
- review staffing levels and consider cancelling leave or placing staff on standby as appropriate
- inform staff of new work pattern and staffing requirements
- advise staff re: time recording requirements especially off-site
- consider welfare issues for staff requested to work from home
- ensure home workers are not omitted from communications

Relocation:

- develop use of the allocated alternative space
- notify colleagues of location and phone numbers
- move into recovery space when informed of readiness
- ensure accuracy of records - especially if manual sheets are necessary due to an I.T. failure (for back input of data)
- provide daily reports to the Recovery Coordinator co-ordinator

- recover off-site vital records
- advise team when IT systems are back on line
- assess synchronisation of computer data and back file data input
- if web and email system restored advise staff to refer to updates posted on it

Staffing:

- arrange for a suitable staff briefing note to those on-site and those at home

- activities for each team
- advise *end users* of service capabilities as part of a broader communiqué

Staffing:

- review and monitor staff welfare and morale
- consider appropriate provision of stress counselling
- arrange regular briefing for all staff
- decide how to productively redeploy staff pending return to full operation
- introduce revised schedules

Next steps:

- review progress and all milestones achieved
- re-establish workflow processes for next months
- procure office suppliers
- finalise office layout at the alternative location
- ensure that outstanding work is complete
- manage and monitor the recovery
- plan move to permanent facilities using normal re-location move procedures – manage salvage of documentation
- take stock of lessons learnt
- revise the business continuity plan

Service Unit mission critical - specific recovery actions

<p>Prioritised mission critical activity - Very High</p> <p>Election administration during critical election period</p> <p>Support AST</p>	<p>Recovery day one</p>	<p>Recovery day two to three</p>	<p>Recovery week one</p>
	<p>Contact Electoral Commission to alert them and to seek support Set up Phones, PCs, email, internet</p>		
	<p>Liaise with support in Scottish Borders Council, contact Scottish Reporters Association to alert them and set up Phones, PCs, email, internet</p>		
	<p>Relocate to alternative secure office in John Gray Centre</p>		

<p>Prioritised mission critical activity - High</p> <p>Support to Chief Executive</p> <p>Support to Leader and Depute Leader</p> <p>Data Protection Breach</p>	<p>Recovery day one</p>	<p>Recovery day two to three</p>	<p>Recovery week one</p>
	<p>Set up Phones, PC, email, internet</p>		
	<p>Set up Phones, PC, email, internet</p>		
	<p>Contact Information Commissioners Office to alert them and set up Phones, PCs (internet, email) to provide all departments with advice and assistance in the event of a breach</p>		

Prioritised mission critical activity - Medium	Recovery day one	Recovery day two to three	Recovery week one
Archives	If physical disruption – initiate Disaster Recovery Plan	Update JGC website re service disruption	
	Initiate reduced staffing protocol	Continue with Disaster Recovery Plan	
Records Store	Initiate Disaster Recovery Plan	Update EInet re service disruption	Assess arrangements
		Initiate arrangements for access to store	Continue with Disaster Recovery Plan (Dunbar Road)
Committees		Initiate alternative arrangements are in place to enable committee meeting schedule to be adhered to as closely as possible	Locate alternative venues and inform councillors, staff and public
FOI/ DP requests		Initiate protocol for dealing with requests in the absence of normal officers	
CMT support		Set up Phones, PCs (internet, email)	
Councillor support		Set up Phones, PCs (internet, email)	
Licensing		Set up Access to Northgate, email and internet to process applications	
Landlord Registration/ HMO		Set up Access to Internet, email and shared drive to provide service	
LSO		Set up access to Northgate, internet and email to provide reports and service	

Single Points of Blockage and Mitigation

	Identified single points of blockage	Mitigation (work around methods employed to overcome)
1	Large percentage of staff unavailable	Identify mission critical activities and redeploy staff from non-critical activities including from other service areas.
2	No Phone network	Remote working is possible for a number of key staff using personal land/mobile phones; IT support required
3	Power/It failure	Allocate staff to other duties; invoke remote working at other Council locations; It support required
4	Key members of Staff unavailable	Put in place succession/contingency plans
5	Record store unavailable	Use Electronic systems to find information
6	John Gray Centre inaccessible	Use web/CALM database to provide information

Provision of service to other departments and external organisations

List the business units you provide services to in order that they can perform their very high / high functions

	What service do you provide to other service units	List level of criticality to other business unit Very High or High only
1	Clerk to AST supports child protection in Children’s Wellbeing	Very high
2	Advice and assistance to all units in the event of a data protection breach	High
3	Support to the Chief Executive in her role as Returning Officer in the administration of Elections	Very High

Mission Critical Equipment

Equipment	Source	Very High	High	Medium
Networked Computer Access & Phones and postal vote counting equipment during critical election period	IT	X		
Networked computer access and phones – all other staff				X

Mutual Support

The support that will be needed from other **service units** to maintain our critical activities

List in order of priority	Service Unit / type of support required
1	IT – Networked Computer Access, Internet and phones

External Suppliers

External Suppliers who are critical to the delivery of the service

List in priority order	Supplier	Service/equipment supplied	BC plan seen? (date)
1 (if in active election period)	Halarose EROS	Supports Electoral Registration and Election Management	Yes, BCP on file (6/9/13)
1 (if in active election period)	Halarose Avantguard	Supports Postal Vote Personal Identifier Verification	Yes, BCP on file (6/9/13)

2 (if in active election period)	Adare	Provides Postal Vote software	Yes, BCP on file (Jul 12)
2	Pointshift TeamTalk	Provide text and email system re. contact with Children's Panel Members	No
2 (during rota development period)	Lockhead Martin PanelPal	Provides software for Children's Panel rota	No (contract via Children's Hearings Scotland)
2 (during recruitment period)	Chirp	Provides support for recruitment and practice issues	No (contract via Children's Hearings Scotland)
3	Jadu	Provides and maintains eGov Committee Management System	Yes, BCP on file (Oct 11 – updated copy sought Sept 13)
3	Northgate	Provides licensing systems	No
3	Scottish Government	Provides Landlord Registration online service	No
3	Orangeleaf Systems Ltd	Provides John Gray Centre website	No

FORMS – for use in the event of plan invocation

A. Service Unit activity log form – used at time of invocation (photocopy as required)						
Item No	Date & Time of Decision	Action Owner (Insert name of Service / Agency)	Description of Action / Decision (Entry must describe an instruction issued to someone to do something)	Updated (Insert Date and Time)	Current Position (Insert summary which describes the current position e.g. Complete or procedure in place and activated etc.)	Signature of decision maker

B. Service Unit workload evaluation form – used at time of invocation (photocopy as required)

Considerations:	Functions:	A	B	C	D	E
What jobs are currently on-going?						
What workload deadlines might / will we miss?						
What workload deadlines are approaching?						
What jobs are close to completion?						
How much extra effort is required to complete?						
What would be the consequences if we don't complete? [Undertake a basic risk assessment if helpful]						
If we fail to complete what is the potential impact on: <ul style="list-style-type: none"> • service • reputation • legal • compliance with National Standards / Regulations? 						
Who are the key staff and what key equipment is needed to complete the job?						
Your recommendation to the Head of Service (Detail the jobs you consider should be done now having balanced the resources required v task urgency)						

E. Service Unit status reporting - photocopy worksheet

TO COMPLETE AT TIME OF PLAN INVOCATION and as called for by Head of Service; / Unit workload status reporting form (one sheet per department or per unit)

Internal issues and pressure points

External Issues and pressure points

Recovery Location
Other issues / notes

List of key events and priorities for rest of week

Annex – Business Continuity Plan supplementary information

PRECAUTIONS

Health and Safety Systems	Salvage	Information Security
<p>All staff using either the old or new premises will be notified of or briefed on:</p> <p>the precautions to be taken to comply with risk assessments.</p> <p>reporting procedures to be followed when recording all H&S concerns.</p> <p>the emergency procedures, which apply to their work location.</p>	<p>Staff should not enter the damaged place of work unless directed to do so.</p> <p>Staff must follow all instructions when safe entry is permitted.</p> <p>Team Leaders will identify those materials, which should be recovered.</p> <p>Details of all materials recovered must be checked against the current inventory to assess and identify needs.</p>	<p>It is important that ELC’s Information Security Policy and security systems are maintained during any period of upheaval.</p> <p><i>Storage of individual’s data must be compliant with data protection legislation. If unsure, seek advice</i></p>
Safekeeping and Storage of Documentation	Safekeeping and storage of critical equipment	
<p>Appropriate sections of Council Retention Schedule</p>	<p>Arrangements should be made for the safe storage of all electronic and other equipment.</p>	
Paper files	Digital files	
<p>Some but not all-confidential client / business information is stored on the server. Where hard copy files are recovered or new files opened these should be stored in a lockable cupboard. Refer to BCMS Guidance Document regarding records.</p>	<p>Staff should continue to follow established arrangements for storing all relevant information on the server.</p> <p>IT can provide support in retrieving information when required or in accessing other networks subject to mission critical prioritisation having priority.</p>	<p>Individual work files stored by staff on hard drives should be backed up and the backup stored in a secure place.</p>
<p>While the Information Technology service unit, in line with policy, back up data on a 24 hourly basis it is prudent to discuss service / Business Unit backup arrangements.</p> <p>Please detail here what arrangements are in place for your service / Business Unit – refer to IT strategy page in this plan – Section 6.</p>		

PLAN MAINTENANCE AND EMBEDDING

TESTING, REVIEW AND AUDITING

The arrangements outlined in this plan will be tested annually by (**Service Unit**) and the plan reviewed and amendments made as appropriate.

In the event of major change to the service or environment this plan will be reviewed, tested and amended accordingly – all such changes are recorded within the version control table.

TRAINING

To ensure continuity of service staff will receive relevant training by managers and team leaders.

Training requirements will be reviewed and updated on a regular basis and as required

Team Leaders will be responsible for maintaining a training log and will make the log available to the Business Manager and /or Director when requested to do so.

TRAINING / EXERCISE / REVIEW RECORD

Date	Type of Event: (Training, Live Incident, Exercise or Review)	What elements tested/reviewed	How many staff involved	Lessons learnt integrated into the plan?
Sep 14	Team meetings	The BCP was an agenda item on all team meetings with all staff asked to think about their	All	

		areas and to come up with suggestions for inclusion in the plan.		
21/11/14		Draft BCP circulated to all staff members and posted on the shared staff area on Corpres. Every staff member asked to read the plan and invited to make suggestions for improvement.	All	
Spring 2015	Training and exercises at team meetings	Each team will be taken through the BCP by their team manager/ leader once it has been approved. One subsequent team meeting will be dedicated to table top exercise.	All	
28/9/15	Table top exercise	The whole BCP was tested using a scenario involving bad weather, flooding and power failures	The Management Team	Learned that the plan works well and that the team has a useful asset in being able to quickly relocate key staff to the John Gray Centre where there is sufficient secure office accommodation and equipment available

VERSION CONTROL

Amendment History:

Version	Date	What was amended?	Prepared /Amended by	Approved by	Date Issued/ re-issued
1.0	21/11/14	Created	Kirstie MacNeill		
1.1	7/3/16	Record of table top exercise that took place in September 2015	Kirstie MacNeill		

From Action Note of CMT meeting 21 Jan 2016:

Decisions	Actions
<p>9. Records Management Plan</p> <p>9.1 Alex Fitzgerald presented a report and there was discussion. Noted progress and the success of the pilot non-IT-based training for relevant staff. It was agreed that Records Management Training be made compulsory for all staff in order to maximise take-up.</p>	<p>JL</p>

Records Management Training – Offline Version

Records Management?

You may not be familiar with the term “Records Management” but you will be familiar with what it means.

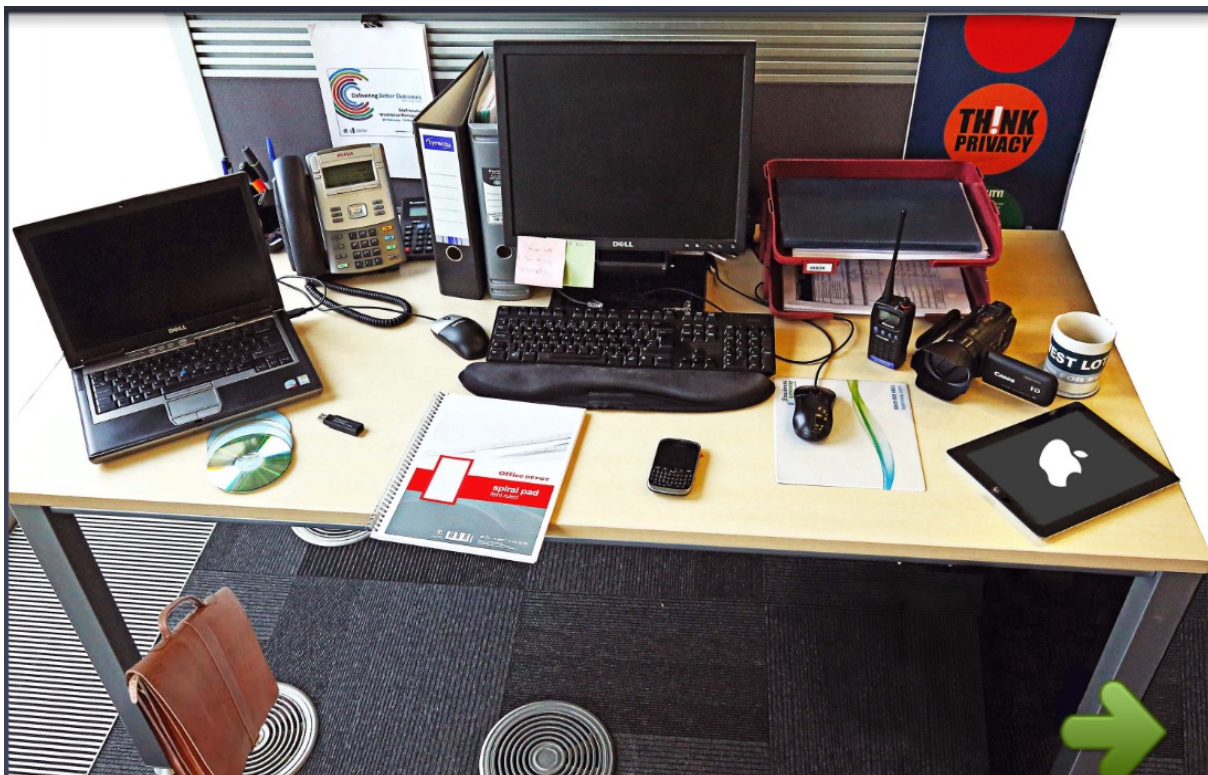
Records Management is the term for when we create, save, file, use or dispose of information. This can be through filling in and sending off an order form, through filing the delivery slip, through saving the email that has some vital instructions in it, the list goes on.

This means that everyone does “Records Management” on a regular basis and due to the Public Records (Scotland) Act we now (as a Council) need to show that we are doing this as well as we can.

Records are everywhere!

Here is an image of a desk.

Can you spot all 15 items that are potential records?



Hopefully now you see that there are potential Records everywhere.

What next?

We have to manage things appropriately, which means:

- Knowing what we have
- Knowing where it is
- Knowing why we have it
- Knowing when and how to dispose of it

How we ensure that we can answer the above questions is covered in two important documents:

Records Management Training – Offline Version

- **East Lothian Council Business Classification Scheme**
 - o *A classification scheme is used to set out the types of records we hold and where they should be kept. It can be looked on as a filing plan as well, East Lothian has developed one that can be used by all departments*
- **East Lothian Council Retention Schedule**
 - o *A retention schedule is used to set out the rules on how long we keep records for and when/ how we get rid of them.*
 - o *It is about 'types' of records i.e.: Minutes of Team meeting, rather than specific records i.e.: minutes of team meeting from 2nd March 2015.*

So why is this important?

Good Records Management helps us in a variety of ways:

- ***It makes it easier to do your job.***
 - o Aren't things better if you can find what you are looking for?
- ***It makes us compliant with other pieces of legislation such as the Data Protection Act and the Freedom of Information (Scotland) Act.***
 - o These laws require that we manage our information effectively and make it available to the public when appropriate.
 - o We can avoid being fined (Data Protection breaches can result in fines up to £500,000), and the Council looking bad
- ***It makes us more efficient generally as an organisation.***
 - o We can stop holding duplicate copies of information, everyone who needs access to information has it and we only hang on to what we actually need.

What do I have to do?

As you can see Records Management is something that everyone is involved with so we need you to make sure that you are doing your part.

- **Are you creating good records?**
 - o Are they accurate and useful, do they show everything they need to?
- **Are you naming files / filing things appropriately?**
 - o Can someone other than you find the information again easily?
 - o Is the file called something that has meaning; other than 'important info.doc'?
- **Are you getting rid of things in line with the retention schedule and appropriately for the type of information?**
 - o If you are responsible for destroying data have you checked that it is authorised and that if it is sensitive/personal data that it is being destroyed confidentially?

Any Questions?

If you have any further questions about Records Management. Your line manager will tell you what procedures to follow but the Records Management Team is available to give more specialist advice and guidance when required.

You can contact the team via: records@eastlothian.gov.uk

Information is also available on ELnet – just search for 'Records Management'

Records Management Training – Offline Version

Questions: (Circle corresponding letter to correct answer below)

1. Is there a relationship between Records Management and compliance with Data Protection and Freedom of Information laws?

- A There is no relationship
- B This is some relationship, but it is not close.
- C Yes - There is a very close relationship between Records Management and compliance.

ANSWER: A B C

2. Which of the following is a potential record:

➤ Database; order book; minutes of a meeting; handwritten notes; voicemail; email.

- A Databases, Emails, Voicemail
- B Order books, Minutes of a meeting.
- C All of the above
- D None of the Above

ANSWER: A B C D

3. What do we use the Retention Schedule for?

- A To set out the rules on how long we keep records for
- B To identify some of the things we want to keep
- C To hide what records we have

ANSWER: A B C

4. Who does Records Management?

- A No One
- B Only Administrative Staff
- C Only Managers
- D Only the Records Manager
- E Everyone

ANSWER: A B C D E

5. How do I get more information / support on Records Management?

- A My Line Manager
- B ELNet
- C The Records Management Team
- D All of the above
- E There is no more support

ANSWER: A B C D E

Name:

Date:

Signed:

To support the delivery of the Records Management Offline Training module we have developed a scoring sheet which calculates the pass mark and acts as proof of the training being delivered.

Each team / department will have a spreadsheet issued to them and in conjunction with the module and the answer sheets whoever has been tasked with delivering the training will need to score the tests and record the outcome.

This is what the scoring sheet looks like:

Name	Date of Training	Question 1	Question 2	Question 3	Question 4	Question 5	Score	Passing Grade	Overall Grade	Training delivered by	Notes
Employee Name A	20/10/2015	Pass	Pass	Pass	Pass	Pass	5	4	Pass	Line Manager's Name	
Employee Name B	20/10/2015	Fail	Pass	Pass	Pass	Pass	4	4	Pass	Line Manager's Name	
Employee Name C	20/10/2015	Pass	Fail	Fail	Pass	Pass	3	4	Fail	Line Manager's Name	
Employee Name C	22/10/2015	Pass	Pass	Pass	Pass	Pass	5	4	Pass	Line Manager's Name	Resit.
Employee Name D							0	4	Fail		

The majority of the cells are self explanatory – the Question grades are from a simple Pass/Fail drop down with formulas doing the rest of the calculations and displaying the final result.

We need to know who has done the training and when, and if they passed or not, it is helpful if we know who delivered the training / did the scoring as well for audit purposes.

4/5 has been selected as the passing grade for this module in line with a similar passing grade in the online version.

Since a Zero score is also possible the lines where no names are listed or the person has yet to take the test will default to 'Fail' until such time as the correct results are entered against their name.

If someone takes the test multiple times in this round that should be recorded as multiple lines to help us demonstrate how rigorous the testing is and to help us improve it if it is proving to not be fit for purpose. This can be recorded in the 'Notes' field.

The template is set up with the first sheet as a locked 'example' to show you what it should look like.

It is possible to have a worksheet per team or whatever suits your needs. Please rename &/or add sheets as required.

Additional rows can be added by copying the content of **Columns C – J** by highlighting them and dragging downwards to fill in the rows needed for all staff. Please ensure that the passing score stays set to '4'.

The results should be sent to the Records Manager for retention and reporting so we can prove that we have delivered this training outside of the online recording system.

Completed sheets should be sent to 'records@eastlothian.gov.uk'

Any comments and feedback can be provided the same way.

Records Management Training Record - Offline version

Name	Date of Training	Question 1	Question 2	Question 3	Question 4	Question 5	Score	Passing Grade	Overall Grade	Training delivered by	Notes
Employee Name A	20/10/2015	Pass	Pass	Pass	Pass	Pass	5	4	Pass	Line Manager's Name	
Employee Name B	20/10/2015	Fail	Pass	Pass	Pass	Pass	4	4	Pass	Line Manager's Name	
Employee Name C	20/10/2015	Pass	Fail	Fail	Pass	Pass	3	4	Fail	Line Manager's Name	
Employee Name C	22/10/2015	Pass	Pass	Pass	Pass	Pass	5	4	Pass	Line Manager's Name	Resit.
Employee Name D							0	4	Fail		

ELC Health Check Activity by Information Governance Compliance Officer 2016

- 18.7.2016 The Abbey Residential Care Home, North Berwick. Privacy notices updated and entries into Data Processing Register
- 21.7.2016 Crookston Residential Care Home, Tranent. Privacy notices updated and entries into Data Processing Register
- 25.7.2016 Fisherrow Adult Resource Hub, Musselburgh. Privacy notices updated and entries into Data Processing Register
- 26.7.2016 Eskgreen Residential Care Home, Musselburgh. Privacy notices updated and entries into Data Processing Register
- 28.7.2016 Port Seton Resource Centre, Port Seton. Privacy notices updated and entries into Data Processing Register
- 28.7.2016 Contact Centre Service Manager, entries into Data Processing Register, decided:
- Layered privacy notice for recorded telephone calls, pointing callers to ELC website, either
 - instructing them to search for 'privacy notice' – they will find a page that lists all privacy notices for the services using the contact centre, or
 - instructing them to search for a specific phrase – they will find a page with the specific privacy notice
- 1.8.2016 Educational Psychologists: Privacy Notice updated, consent forms updated, entries into Data Processing Register
- 11.8.2016 GIRFEC Lead Officer: entries into Data Processing Register, no privacy notices or consent forms
- 25.8.2016 Tynebank Resource Centre. Privacy notices updated and entries into Data Processing Register
- 29.8.2016 Web Officer Education:
- 31.8.2016 Early Learning & Child Care: Privacy notices updated and request for list of personal data categories made to member of staff
- 1.9.2016 Information & Research, Education: first discussion, decision on layered privacy notices
- 7.9.2016 Parent Council Manager: Privacy notices updated and request for list of personal data categories made to member of staff – to be received 3rd week of October
- 24.11.2016 Strategy Officer, established the register, the decision was made not to issue written privacy notices if complaints are received from service users as this would cause distress. Rather, the social worker taking the complaint will carefully and in easy language explain to the service user what will happen.
- 5.1.2017 Workforce Planning and Development, completed health check.